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Rice Flour Standards and Labelling Guidelines Established

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Report Highlights:

In an effort to encourage production diversion from table rice, Japan's Ministry of Agriculture, Forestry and Fisheries (MAFF) has been incentivizing production of rice for flour. However, Japanese consumption of rice flour has remained flat at roughly 20,000 MT (rice equivalent) per year. One of the issues deterring increased consumption is reportedly quality inconsistencies (such as moisture content) of the flour due to the use of numerous rice varieties and manufacturing methods. To expand rice flour use, MAFF released "Rice Flour Standards by Use." Additionally, to capture a potential growth in demand for gluten-free foods, MAFF also released "Labelling Guidelines to Promote Rice Flour Products" to set a standard for labeling non- glutinous rice flour and rice flour products.

General Information:

Given the declining consumption of table rice in Japan, MAFF has incentivized production diversion from table rice to rice for other uses, such as rice for feed, flour, processing, and whole crop silage. Despite the high subsidy level for rice for flour (a maximum of 105,000 yen/10 Are), the annual production of rice for flour in Japan has remained relatively flat (i.e. around 20,000 MT (rice equivalent) per year).¹ The advancement of milling technologies has enabled Japanese millers to mill rice to a smaller grain size with less starch damage, and produce new types of rice flour which can be suitably paired with wheat to make bread, confectionary and noodles. To help consumers' select the appropriate rice flour for its intended use, MAFF has established rice flour standards by use for: Number 1- Confectionary and Cooking, Number 2 – Bread, and Number 3 - Noodles (see Attachment).

The term, “gluten-free” is not yet widely recognized in the Japanese market as the demand for gluten-free food remains small. However, to expand rice flour use by capturing an expected increase in demand for gluten free foods at home and abroad in the future, MAFF established labelling guidelines for rice flour products and will allow rice flour containing one ppm or lower of gluten to be labelled as “Non-Gluten” (see Attachment). MAFF's threshold is significantly more stringent than the allowances set by the U.S. Food and Drug Administration (less than 20 ppm) and the European Commission (20 ppm or lower).² MAFF explained that the “Rice Flour Standards by Use” (the Rice Flour Standards) and the “Labelling Guidelines to Promote Rice Flour Products” (the Labeling Guidelines) were designed to support the rice flour industries' efforts to promote rice flour derived from Japanese rice. Accordingly, only rice flour derived from Japanese rice is covered by the Rice Flour Standards and the Labeling Guidelines.

The Japan Rice Flour Association (JRFA) was established in May 2017 in an effort to promote Japanese rice flour. The JRFA is now in the process of establishing factory audit standards for third party certification, and a logo to be used to demonstrate certification. The certification and “Non-Gluten” labelling are expected to start being used in the fall of 2017. The JRFA also reports that it plans to hold promotional events overseas.

Since 2010, nearly 10 MT of rice flour has been imported under the minimum access program per year (HS110290310, tariff free) for industrial use (as an ingredient in glue). Rice flour can also be imported outside the minimum access import program (HS110290390), for which a customs duty of 375 yen/kg is applied. Under this category, 20 MT of rice flour was imported in CY2016 which was used, for example, to make Vietnamese rice noodles.

¹ Historically, rice flour has been used to make various dumplings, rice cakes, etc. in Japan.

² The lower gluten threshold in the Labeling Guidelines is reportedly to market Japanese rice flour to people in the world who suffer from gluten intolerance.

The Rice Flour Standards and the Labeling Guidelines are not legally binding. Accordingly, labeling the use for the rice flour and whether or not the product is non-glutinous is voluntary. However, non-glutinous labelling which is not certified by an approved third party certifier, or for products containing higher protein levels than the established threshold, will be in violation of the Food Labelling Law.

Japanese Imports of Rice Flour (MT)

HS110290310, Rice Flour, Imported By The The Japanese Government According To Article 30 Of "The Law For Stabilization Of Supply- Demand And Price Of Staple Food" Imported To Be Purchased And Sold By The Japanese Government In Response To A Joint Application By Seller											
Partner Country	CY1995 - CY2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
World	0	406	686	150	10	10	10	10	10	10	10
Thailand	0	406	686	150	10	10	10	10	10	10	10

HS110290390, Rice Flour, N.E.S											
Partner Country	CY1995 - CY2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
World	0	5	2	2	8	13	10	7	13	13	20
Vietnam	0	0	0	0	0	0	0	2	0	2	10
Taiwan	0	2	1	0	6	12	10	4	11	11	8
Thailand	0	3	1	2	1	1	0	1	2	0	2

Source: Global Trade Atlas

ATTACHMENT

Rice Flour Standards by Use

I. Intention

While the use of {Japanese} rice for flour has been steady at around 20,000 MT per year, certain efforts (e.g. encouraging reductions in the cost of milling and development of rice flour products without adding gluten) have been made to expand the use of rice flour. As the majority of rice flour is produced by small-scale manufacturers using several rice varieties and applying various manufacturing methods, the quality of rice flour (such as moisture content), is not consistent. The inconsistency in the quality is considered one of the factors preventing an increase in rice flour consumption. Accordingly, the “Rice Flour Standards by Use” is established to promote manufacturers’ voluntary efforts to expand consumption of rice flour products.

II. Status of the Rice Flour Standards by Use

From the view point of promoting rice flour, the Rice Flour Standards are intended to encourage rice flour manufacturers to undertake voluntary efforts to manufacture rice flour in compliance with the Rice Flour Standards.

III. Scope of manufacturers

All {Japanese} rice flour manufacturers, regardless of their business size, are subject to the {voluntary} Rice Flour Standards.

IV. Standards by use and labelling:

1. Main uses of rice flour are separated into categories for confectionary and cooking, bread, and noodles.
2. Standards for grain size, starch damage, amylose content, and moisture content for rice flour are set by use as noted in 1. above (see, **Rice Flour Standards by Use and Use Indications**)
3. Rice flour complying with 2. above is labelled with the use as defined in the attachment (see **Use details according to Amylose Content and Examples of Specific Use**)

Rice Flour Standards by Use and Use Indications

Use Indication	Number 1	Number 2	Number 3	Measurement Method
Main Use	Confectionary and Cooking	Bread	Noodles (partial inclusion of confectionary and cooking use)	
Grain Size	50 % or more of the grains are no more than 75 µm in diameter			laser diffraction/scattering grain size distribution measuring method
Starch Damage	Less than 10 %			AACC method 76-31
Amylose Content	Less than 20 %	15 % or more but less than 25 %	20 % or more	Iodine colorimetric method or near infrared spectroscopy
Moisture	10 % or more but less than 15 %			105 °C dry method or electric resistance method (electrical moisture meter)
Ratio of gluten (additive)		Around 18 – 20% Adding gluten must be stated		

Use Details According to Amylose Content and Examples of Specific Use

Number 1		Number 2	Number 3	
Amylose Content			Amylose Content	
<i>Soft type</i>	<i>Middle type</i>		<i>Hard type</i>	
Less than 15%	15 % or more but less than 25 %		25 % or more	
Soft sponge cake such as chiffon cake, and cookies	Sponge cake, cookies, batter for deep fried, <i>Okonomiyaki</i> , etc	Bread in general	Noodles in general	High elasticity noodles, hard cakes

1. For Number 1 rice flour, suitable uses may differ depending on the levels of amylose content. Accordingly, rice flour manufacturers shall include information on suitable use for consumers in reference to the above table.
2. Number 3 rice flour, with 25 percent or more amylose content, is highly suitable for high elasticity noodles, and rice flour manufacturers shall indicate the information on suitable use for consumers in reference to the above table.

Rice flour such as “Joshinko,” “Shiratomako,” “Domyojiko,” etc., which have traditionally been used to make specific products like dumpling and rice cakes, is outside the Rice Flour Standards because the names of the traditional rice flour already indicate its intended use.

Labelling Guidelines to Promote Rice Flour Products

I. Intension

While the use of rice for flour has been steady at around 20,000 MT per year, certain efforts (e.g. encouraging reductions in the cost of milling and development of gluten free rice for products) have been made to expand the use of rice flour. Rice flour use is expected to increase if rice flour products can capture an expected increased demand for gluten-free foods in the future. Accordingly, the “Labelling Guidelines to Promote Rice Flour Products” have been established to support manufacturers’ initiatives to popularize rice flour products.

II. Status of the Guidelines

From the view point of promoting rice flour, the Labeling Guidelines are intended to encourage manufacturers of rice flour and rice flour products to undertake voluntary efforts to incorporate non-glutinous labeling in compliance with the Labeling Guidelines

III. Scope of manufacturers

All manufacturers of {Japanese} rice flour and rice flour products, regardless of their business size, are subject to the {voluntary} Labeling Guidelines.

IV. Labelling

1. Scope of products

The Labeling Guidelines are applied to the following products:

- 1) Rice flour containing 1ppm or less gluten as a result of a sampling test for gluten content by the gluten test method outlined in section V.
- 2) Processed products containing rice flour prescribed in 1) above as a main ingredient, but not containing other rice flour, gluten, or wheat whose labelling is required under the Food Labelling Law (Law No.70 of 2013).

2. Items of labelling

The items to be labelled for products mentioned in 1. above (hereinafter referred to as “non-glutinous rice flour products” are set below. Labelling IV.1.1) above requires the third party tests.

- 1) Products IV.1.1) above are labelled with the term, “Non-Gluten”, with the additional statement that the gluten content is 1 ppm or less.
- 2) Products IV.1.2) above are labelled with “use of “Non-Gluten” rice flour and not containing gluten or wheat ingredients.”

V. Gluten Test Method

A quantitative test for specific ingredients in Annex 1-2 of the “Test Methods for Food Containing Allergen” of the Food Labelling Standards (Number 131, Notification by Deputy Director General of the Consumer Affairs Agency, March 30, 2015) is applied to test gluten. The concentration of gluten protein contained in the sample used for the validation among laboratories shall be set at 1 microgram/gram (the concentration is 1.2 microgram/gram for wheat protein). Also, the evaluation of quantitative analysis is based on the test method indicated in section VII.

VI. Points to be noted

1. Manufacturers of products outlined in section IV.1.1) shall keep records of tests required to demonstrate compliance with the “Non-Gluten” labelling guidelines. In order to prevent misrepresentation, manufacturers will make efforts to comply with the “Law for the Prevention of Unreasonable Premiums and Misrepresentation concerning Products and Services.”
2. Manufacturers of non-glutinous rice flour products shall conduct necessary inspections to prevent comingling of gluten and wheat in “Non-Gluten” rice flour products during the manufacturing process, and will maintain inspection records and relevant documents.
3. Manufacturers of “Non-Gluten” rice flour products shall make efforts to obtain ISO and HACCP certification to ensure an appropriate food safety management system.

VII. The quantitative test kits for wheat protein, as follows, are confirmed as the quantitative test method for gluten, as outlined in the “Gluten Test Method” section above (in section V).

- Nippon Ham FASTKIT ELISA Ver. III Wheat
- Prima Ham Allergen I ELISA II Wheat
- Morinaga Institute of Biological Science, Inc. FASPEK ELISA II Wheat (gliadin)