Imported Foods Monitoring and Guidance Plan for FY 2021

1 Purpose

The purpose of the Plan is to promote the intensive, effective and efficient monitoring and guidance over imported foods, and thereby to further ensure the safety of imported foods.

2 Effective period of the Plan

The Plan shall be effective from April 1, 2021 till March 31, 2022.

3 Current circumstances of imported foods etc.

(1) Current circumstances of imported foods

The total number of import notifications filed for foods, additives, equipment, containers and packages and toys (hereinafter collectively referred to as "foods") imported into Japan for the purpose of marketing or any other commercial purposes during FY 2019 are about 2.54 million and their import weight reached 33.27 million tons. Meanwhile, in accordance with the Food Balance Sheet by the Ministry of Agriculture, Forestry and Fisheries, the food self-sufficiency ratio (food self-sufficiency ratio based on the total calorific value supplied) of our country stands at about 40%, and this means that, on calorie basis, we are almost 60% dependent on foods imported from other countries.

According to the interim report published in December 2020 about the results of the inspections and guidance under the Imported Foods Monitoring and Guidance Plan for FY 2020, the number of import notifications filed during the period from April to September, 2020 is approximately 1.16 million [1.30 million] and the import weight reached some 11.68 million tons [12.49 million tons], and the number of inspections conducted during said period amounted to approximately 98,000 [112,000], out of which 305 cases [407 cases] were found as violating the Food Sanitation Act (the Act No. 233 of 1947; hereinafter referred to as "the Act") (Figures in bracket [] show the figures of the same period last year. All of these figures are preliminary figures).

(2) Review of monitoring and guidance results based on Imported Foods Monitoring and Guidance Plan for FY 2020

The Ministry of Health, Labour and Welfare (hereinafter referred to as the "Ministry") and quarantine stations have improved the inspection system at the time of import, including the addition of inspection items and the installation and maintenance of sufficient testing equipment for inspection. In the event that a violation of the Act is detected by monitoring inspections, etc. or information on recall of food, etc. is obtained in the exporting country, the measure at importation has been strengthened by monitoring inspections*1 and inspection orders*2, etc.. In addition,

discussions were held with exporting countries toward the enforcement of the Act for Partial Revision of the Food Sanitation Act (Act No. 46 of 2018; hereinafter referred to as the "Revised Act").

- *1 Monitoring Inspection means inspections systematically implemented every fiscal year for the purposes of monitoring safety conditions of various foods in accordance with the provisions of Paragraph 1, Article 28 of the Act and of introducing necessary measures such as strengthened frequency of inspections on importation in the case of any violation of the Act.
- *2 Inspection Order means a ministerial order that requires importers to have imported foods with a high risk of violating the Act inspected on each importation of the foods in accordance with the provisions of Paragraph 2 or 3, Article 26 of the Act.
- 4 Imported Foods Monitoring and Guidance Plan for FY 2021
- (1) The implementation of monitoring and guidance over imported foods
 - It is stipulated in Article 4 of the Food Safety Basic Act (the Act No. 48 of 2003) that the food safety shall be ensured by taking necessary measures appropriately at each stage of the food supply processes both in Japan and in exporting countries. Based on this standpoint, in order to secure the safety of imported foods, the following measures are to be taken from the stage of the production processes in exporting countries up to the stage of their distribution after importation into the domestic market in Japan.
 - (i) In order to promote sanitary control measures during the production, manufacturing, processing etc. in exporting countries (hereinafter referred to as "production etc."), the MHLW will provide information on our food-sanitary regulations to embassies located in Tokyo, importers, and the relevant government officials and producers of exporting countries and will publish such information on the website of the MHLW (hereinafter simply referred to as "the website"). In addition to these efforts, the MHLW will hold bilateral discussions with exporting countries, conduct on-site inspections in exporting countries, and provide technical support to those countries.
 - (ii) If any violation of the Act is detected, the MHLW will introduce necessary measures such as strengthening of inspections on importation, and at the same time, will publish the detected violation cases in accordance with Article 63 of the Act.

- (iii) The MHLW will issue an order for comprehensive import ban on foods produced in a specific country or area or by a specific producer in accordance with the provisions of Paragraph 1, Article 9 or Paragraph 1, Article 17 of the Act if the MHLW considers such measures are inevitable to prevent possible harm to the food sanitation in our country.
- (iv) If an importer has repeatedly violated the Act, the MHLW will provide necessary instructions to the importer in order to have the importer rectify the cause of the violation, and should the occasion demand, the MHLW will issue an order to prohibit or suspend the business of the importer in accordance with the provisions of Paragraph 2, Article 55 of the Act (hereinafter referred to as "the prohibition or suspension of the business of importers").
- (v) Quarantine stations will carry out a check, based on import notification documents filed under Article 27 of the Act and inspections on the identity of actual goods referring to the contents of import notification documents, and as to compliance with the Act including compliance with specifications and standards relevant to foods (hereinafter referred as "the standards") in accordance with the provisions of Paragraph 1, Article 13 and Paragraph 1, Article 18 of the Act.
- (vi) Quarantine stations will carry out monitoring inspections in a systematic manner to ensure the extensive monitoring of various imported foods for the purpose of food safety.
- (vii) In order to prevent possible harm to the public health in terms of food sanitation, quarantine stations will order inspections of imported foods with a high risk of violation of the Act in accordance with the provisions of Paragraph 2 or 3, Article 26 of the Act.
- (viii) Quarantine stations will hold seminars for and provide pre-import guidance to importers in order to encourage them to promote, as one of their duties as food business operator, voluntary sanitary controls.
- (ix) Upon detection of a violation of the Act, quarantine stations will take necessary measures such as ordering the importer to discard, reship or use for any other purpose than human consumption (hereinafter referred to as "discard, etc.") such violating foods and will direct the importer to provide a report on measures taken by the importer to prevent the recurrence.
- (x) After imported foods are released into the domestic market, local governments such as the governments of prefectures as well as cities and special wards with public health centers (hereinafter referred to as "local governments") will be placed in charge of monitoring and

guidance over the imported foods. Upon detection of any violation of the Act, the MHLW, quarantine stations and local governments will cooperate with each other in taking measures to ensure the accurate and swift recall of the violating foods by the importer.

(2) Basic direction for monitoring and guidance over imported foods in FY 2021

In the Imported Foods Monitoring and Guidance Plan for FY 2021 (hereinafter referred to as the "Monitoring and Guidance Plan"), measures will be continued, and based on recent situations around imported foods, etc., systems will be developed to thoroughly implement appropriate monitoring and guidance, such as improving the qualifications of food sanitation inspectors at quarantine stations and securing necessary number of personnel and inspection equipment.

Monitoring inspections will be conducted in a planned manner based on the results of monitoring inspections, etc., and the inspection items and strengthening of inspections will be reviewed and examined based on the results of supervision and guidance, etc. even in the middle of the fiscal year.

In addition, in order to ensure the steady implementation of the Revised Act, bilateral consultations will be held including confirming hygiene control measures in exporting countries that require hygiene control based on Hazard Analysis and Critical Control Point (HACCP) and the attachment of hygiene certificates and the information of the Revised Act will be disseminated.

Furthermore, as the number of imported foods is expected to increase due to the progress of economic partnership agreements or as the food chains are expected to become increasingly complex due to globalization, the existing inspections systems mainly at the time of import and the efforts on ensuring the safety at the production stage in exporting countries effectively will be continued.

- 5 Specific Contents of Imported Foods Monitoring and Guidance Plan for FY 2021
- (1) Matters to require intensive monitoring and guidance with confirmation of import notifications
 - (i) Checks based on import notifications in accordance with the provisions of Article 27 of the
 Act

With respect to a food for which an import notification is filed in accordance with the provisions of Article 27 of the Act, the quarantine station will confirm; that the food does not fall under any one of those mentioned in each paragraph of Article 6 (Prohibited food and additives to sell), Paragraph 2 of Article 10 (Prohibition of sales of meat having diseases), or Article 16 (Prohibition of sales of toxic and harmful apparatus or containers and packaging) of the Act; that the food is not subjected to an import ban in accordance with the provisions of Paragraph 1, Article 9 or Paragraph 1, Article 17 of the Act; that additives contained in the food fall under those as set forth in the provisions of Article 12 of the Act; and that the food is in compliance with the standards, by

checking the import notification document filed by the importer of the food and, as necessary, by checking any certificate document issued by the government of the exporting country, by asking reports from the importer, and/or administrative inspections, etc.

- (ii) Monitoring inspection in accordance with the provisions of Paragraph 1, Article 28 of the Act
- a. Development of a Monitoring Plan

In order to ensure that monitoring inspections will be carried out in an intensive, effective and efficient manner, in principle, the MHLW will determine for each food group the number of inspections to be conducted for each inspection item stipulated for the monitoring inspection (hereinafter referred to as "the monitoring plan") so that a violation will be detected with a certain level of reliability from statistical viewpoint, after taking into account the violation rate, the number of import notifications filed, the import weight and potential impacts on the public health that may be caused by the violation.

In addition, even for inspections having no violation detected from the inspections conducted so far, the MHLW will ensure that appropriate number of inspections will be conducted. For the monitoring plan for FY 2021, the number of inspections shall be about 100,000 cases (increased 300 cases compared to FY 2020) as shown in Schedule 1, and the monitoring plan may be reviewed taking into consideration import trends, survey results of food sanitation regulations at the stage of exporting countries, and information about food-related health damages and recalls of unsanitary foods occurring in exporting countries.

In addition, the MHLW will ensure the steady implementation of inspections of residual agricultural chemicals in accordance with the Positive List System*3, taking into account the regulations concerning agricultural chemicals in other countries, the status of their use, cases of detection of agricultural chemicals as well as violation cases of agricultural food products at the time of import.

*3 Positive List System for residual agricultural chemicals means a system that prohibits, in principle, the sale, etc. of foods in which agricultural chemicals remain in excess of a predetermined level that may not harm human health.

In addition to continuing to conduct inspections based on the status of violations, in order to prevent the occurrence of health hazards, priority will be given to inspections of similar foods reported food poisoning cases, aflatoxins, pathogenic microorganisms, and other items that are likely to cause health hazards both in Japan and overseas.

b. Systematic implementation of monitoring inspections

Each quarantine station will prepare its own annual plan for carrying out such number of inspections as the MHLW will assign to each of them in accordance with the number of inspections planed in the monitoring plan in order to ensure the systematic implementation of inspections.

Meanwhile, as for foods subject to inspection order concerning residual agricultural chemicals, monitoring inspections will be carried out in order to verify the reliability of the control of residual agricultural chemicals, etc., in export countries, since there are possibilities that the control of residual agricultural chemicals being conducted in exporting countries may be insufficient and that any change in agricultural chemicals used in exporting countries may occur and there is also a concern that agricultural chemicals other than those covered by the inspection order may be contained in the foods in excess of standard values.

The MHLW will check the implementation of inspections based on the monitoring plan and provide instructions to quarantine stations as necessary. Should it be found difficult to carry out station by station or food group by food group inspections as planned due to any change in import trends or any other circumstances, the monitoring plan will be reviewed to ensure that inspections are carried out in accordance with the actual import situation.

In the case of an emergency, the MHLW will entrust affairs relevant to inspections to registered conformity assessment bodies in accordance with the provisions of Paragraph 4, Article 28 of the Act.

c. Strengthening of monitoring inspections

The MHLW shall instruct quarantine stations to strengthen inspections of imported foods, etc., as necessary, when information on the recall of foods, etc. or the occurrence of health hazards in exporting counties etc. is obtained, when violations of the Act are found through monitoring inspections, etc., when violations of the Act are found through monitoring and inspections by prefectures, etc., or when cases where health hazards are likely to occur are confirmed.

As for the reinforcement of inspections of residual agricultural chemicals, in order to grasp the level of the use of the control over agricultural chemicals, etc. by the exporting country, the MHLW will carry out monitoring inspections at a higher frequency for imported foods and inspection items concerned so that violations may be detected with a certain level of reliability from statistical viewpoint.

In addition, in order to prevent any food violating the Act from human consumption, the MHLW will continue to carry out inspections whose results can be obtained in a shorter period of time.

d. Cancellation of strengthening of monitoring inspections

When the MHLW determines that there is no longer a concern that foods violating the Act may

be exported to our country, the normal monitoring system will be reinstated by canceling the strengthening of monitoring inspections in accordance with either of the following procedures, i or ii:

- i The exporting country has identified the cause of the violation, and based on the findings preventive measures have been introduced such as the formulation of a new regulation, the improvement of the control system of agricultural chemicals and the strengthening of the inspection system. Then upon confirmation of the effectiveness of such measures, the strengthening of monitoring inspections may be cancelled; or
- ii When no violation of similar nature is found after one year from the date on which the monitoring inspections were strengthened or after more than 60 specimens were inspected, in principle, the strengthening of monitoring inspections may be cancelled.
- (iii) Administrative inspections other than the monitoring inspection in accordance with the provisions of Paragraph 1, Article 28 of the Act

In addition to inspections based on the monitoring plan, quarantine stations will conduct inspections on imported foods based on the import notification documents when they are imported into Japan for the first time (hereinafter referred to as "the initial import"), when they especially need sanitary control in exporting countries, when an accident has occurred during the transportation, or on any other occasions requiring inspections.

In order to promote voluntary controls by importers, inspections on the identity of actual goods referring to the contents of import notification documents will to be carried out.

- (iv) Inspection order in accordance with the provisions of Paragraph 2 or 3, Article 26 of the Act
 - a. Issuance of an inspection order

When the Minister of Health, Labour and Welfare deems it necessary in order to prevent any harm to the food sanitation of the country that may arise out of an imported food with a high risk of violation of the Act, the MHLW will order importers to have the imported food inspected in accordance with either of the following procedures, i. or ii.

Meanwhile, when the food is added to the list of foods subject to inspection order, the MHLW will provide easy-to-understand information about the potential health hazards that may be caused by the foods, etc.

i When a harm to health has been caused or is concerned to be caused by the imported food in the exporting country and/or our country, or when a violation of the Act has been detected as a result of the monitoring inspection of aflatoxin, pathogenic microorganisms, etc., the imported food manufactured by the same manufacturer, processed by the same processor, or imported from the same exporting country will be immediately subjected to an inspection order.

ii When more than one violation of the Act has been detected with regard to residual agricultural chemicals as a result of the monitoring inspection of the imported food manufactured by the same manufacturer, processed by the same processor or exported from the same country, all or part of the imported food in question will be subjected to an inspection order, after taking into account the regulations and the sanitary controls being implemented in the exporting country, the historical compliance record of the imported food and other factors.

b. Cancellation of an inspection order

When the MHLW determines that there is no longer a concern that the food violating the Act will be exported into our country, the normal monitoring system will be reinstated by canceling the inspection order in accordance with either of the following procedures i or ii:

- The exporting country has identified the cause of the violation, and based on the findings preventive measures have been introduced such as the formulation of a new regulation, the improvement of the control system of agricultural chemicals and the strengthening of the inspection system. Then upon confirmation of the effectiveness of such measures through bilateral discussions, on-site inspections, or inspections on importation of the food, the inspection order may be cancelled; or
- As for foods subject to inspection order with respect to residual agricultural chemicals, etc., if no new violation is detected during two years from the date on which the most recent violation was found after the date of the notification of an inspection order (or from the date of notification of an inspection order if no violation has occurred since the date of such notification) or if there is no new violation during one year from the said date and at the same time, more than 300 specimens have been inspected based on the inspection order, the inspection order may be cancelled.

Thereafter, monitoring inspections will be carried out on a higher proportion of the imported food and for more inspection items so that violations will be detected with a certain level of reliability from statistical viewpoint with respect to inspection items applicable to the imported food and upon detection of any violation, the food will be immediately subjected to inspection order.

(v) Comprehensive import ban in accordance with the provisions of Paragraph 1, Article 9 or Paragraph 1, Article 17 of the Act

As for an imported food produced in a specific country or area or by a specific business entity, if

the violation rate stands above approximately 5% of the overall number of the food inspected and if it is highly likely that the importation of the violating food will continue taking into consideration the level of the food sanitary control in the exporting country, the MHLW will conduct review taking into consideration the extent of damage to human health that may be caused by the food, and the Minister of Health, Labour and Welfare will issue a ban on the importation of such food after consulting the Pharmaceutical Affairs and Food Sanitation Council, to the extent that such a ban is deemed inevitable in order to prevent potential food sanitation problems.

(vi) Emergency measures in response to alert information, etc. from other countries

In order to ensure the safety of imported foods, the MHLW will gather information on food-safety problems occurring in other countries through relevant ministries and agencies, the National Institute of Health Sciences, the National Institute of Infectious Diseases and the governments of exporting countries and through the International Food Safety Authorities Network (INFOSAN) run by the World Health Organization (WHO) and will publish major cases on the website. And if it is found through the search that the violating food have already been imported into our country, the MHLW will instruct the relevant quarantine stations or local governments to investigate into the level of the distribution and the stock status of the food in Japan and also instruct them to direct the importers and other concerned parties to carry out inspections, the recall of the food and/or any other appropriate measures. The MHLW will also instruct quarantine stations to reinforce their inspections over the food and will publish the progress of countermeasures being implemented.

(2) Promotion of sanitary control measures at the stage of exporting countries

The MHLW will promote sanitary control measures in exporting countries through the following efforts so that any violation of the Act may be prevented at the stage of the production processes in exporting countries.

(i) Dissemination of information about the food-sanitary regulations of our country and other relevant information. The MHLW will provide on the website the English translation of the food sanitary regulations of our country, the lists of foods subject to inspection order or to enhanced monitoring inspection, this Plan as well as the results of the monitoring and guidance conducted under the Plan with an aim to promote information dissemination.

In addition, the MHLW will strive to communicate such information widely among the government officials and producers of exporting countries by holding briefing sessions for the relevant staff of embassies located in Tokyo at the time of the revision of relevant standards, through seminars on food sanitary regulations organized by the Japan International Cooperation Agency (JICA) as well as by holding explanatory meetings in exporting countries.

(ii) Bilateral discussions and on-site inspections

Not only with respect to import foods subject to inspection order but also with respect to import foods with a high risk of violation of the Act, the MHLW will ask, through bilateral consultations and other opportunities, the governments of the exporting countries to investigate into the causes of the violations and to develop preventive measures based on the results, and thereby will strive to promote the implementation of sanitary controls during the stage of the production processes, the enhancement of monitoring systems and the introduction of pre-export inspections in the exporting countries.

Meanwhile, in order to encourage exporting countries to promote the sanitary control measures for foods exported to Japan, the MHLW will gather information and conduct on-site inspections in a systematic manner by placing particular emphasis on countries in which a large number of violations have been detected, according to the interim report about the results of the inspections and guidance under the Imported Foods Monitoring and Guidance Plan for FY 2020, in addition to countries exporting large amount of foods to our country as well as the member countries of the economic partnership agreements, considering that the majority of violations reported so far consist of violations of each paragraph of Article 6 of the Act that relates to toxic or hazardous substances such as mycotoxins and violations of Paragraph 2 or 3, Article 13 of the Act that relates to the standards concerning agricultural chemicals, veterinary drugs, microorganisms and additives.

Further, in order to ensure the safety of imported beef, etc., if it is necessary to verify the sanitary control measures being implemented at the production process in the exporting countries, the MHLW will dispatch experts to the exporting countries to carry out on-site investigations of the sanitary control measures of the exporting countries.

(iii) Technical cooperation, etc.

The MHLW and quarantine stations will promote technical cooperation, etc. that will contribute to the enhancement of the monitoring systems of exporting countries through information dissemination about the food sanitary control regulations of our country and through supports for the improvement of testing techniques of those countries about residual agricultural chemicals, mycotoxins and other substances.

(iv) Efforts for Enforcement of the Revised Act

In order to ensure the steady enforcement of the Revised Act, the MHLW will conduct on-site inspections to confirm sanitation control measures in the exporting country or will hold bilateral consultations in the event of food sanitation problems if there is necessity of verification of sanitation control measures at the stage of production, etc., in the countries of exporting livestock and poultry for which sanitation control measures based on HACCP are required or in the countries

of exporting dairy and dairy products, pufferfish and oysters for raw consumption for which health certificates are required to be attached for import.

(3) Promotion of voluntary sanitary controls by importers

Paragraph 1, Article 8 of the Food Safety Basic Act stipulates that food business operators, including importers, shall be responsible for taking necessary measures to ensure food safety at each stage of the food supply processes based on the recognition that they bear the primary responsibility for ensuring food safety. Also, Paragraph 1, Article 3 of the Act stipulates that food business operators, including importers, are required to take necessary measures under their own responsibilities such as the acquisition of necessary knowledge and technology, ensuring the safety of raw materials and the implementation of voluntary inspections to ensure the safety of imported foods.

In light of these requirements, quarantine stations will promote voluntary sanitary controls among importers through the following guidance and measures with an aim to prevent violations of the Act before they occur.

(i) Basic guidance for importers

Quarantine stations will strive to make sure that importers have a thorough understanding of the regulations on food sanitary as well as their responsibilities as importers such as compliance with statutory import procedures, inspection systems and the standards as well as submission of sanitary certificates required to be attached to imported foods.

Meanwhile, from the standpoint of the promotion of voluntary sanitary controls by importers, quarantine stations will provide importers in a timely manner with information on imported foods violating the Act and sanitation problems, newly established standards, and food sanitary regulations at the stage of exporting countries, and will provide guidance to importers through seminars or at the time of import notification that may lead them to voluntarily secure the safety of imported foods.

Basic guidance items for importers are listed in Schedule 2. Additional guidance may be given to importers depending on exporting countries and the types of foods. As for processed foods, in accordance with the "Guidelines on Voluntary Hygiene Control of Import Processed Foods" (hereinafter referred to as the "Processed Foods Guidelines") attached to the "Notification concerning the Guidelines on Voluntary Hygiene Control of Import Processed Foods", FS Notification No. 0605001, dated June 5, 2008, issued by the Director General of the Department of Food Safety, Pharmaceutical and Food Safety Bureau, MHLW, importers will be instructed to conduct necessary confirmation at the stage of the production process in exporting countries by taking into consideration the status of the development and implementation of food sanitary regulations in exporting countries and the level of sanitary controls implemented by the

manufacturers.

Furthermore, quarantine stations will urge importers to make sure to confirm that foods to be imported have not been illegally produced in exporting countries and also to confirm, by using the checklist based on the Processed Foods Guidelines, the conformance to the Act of raw materials, additives, manufacturing processes, inspection data and all other aspects.

In the case of foods sold as "supplements", guidance will be provided to ensure the safety of food by checking the usage as foods or eating habits in exporting countries. In the case of foods containing ingredients, etc. that the MHLW has been calling for attention in response to the reported cases of health damage in Japan and overseas, guidance will be provided to implement appropriate management. In the case of foods containing specific ingredients or substances designated by the Minister of Health, Labour and Welfare, guidance will be provided to thoroughly confirm that the manufacturing method complies with the Act.

In order to steadily implement the Positive List System for Food Appliances and Containers and Packaging*4, instruct importers to disseminate the system and thoroughly confirm compliance with the Act.

*4 Positive List System for Food Appliances and Containers and Packaging means a system that evaluates the safety of the substances and prohibits, in principle, the use of substances, except for those approved for use to food appliances and containers and packaging.

Furthermore, importers are instructed to make proper import notifications based on accurate and latest information obtained from producers, etc., and also to confirm the identity of actual goods referring to the contents of import notification documents for foods imported for the first time and for foods such as meat, fishery products, etc. which especially need sanitary control in exporting countries. When importers intend to import foods on a regular basis, they will be instructed to make sure to sufficiently confirm that there are no changes in raw materials and manufacturing process used for the foods as well as the identity of actual goods referring to the contents of import notification documents, and the conformity of goods of import notification with the items of the results of voluntary inspections presented in the import notification.

In addition to these efforts, quarantine stations will provide necessary information to importers whenever the standards are revised, inspection is enhanced, sales are prohibited, or otherwise related changes are made.

(ii) Pre-import guidance

Based on the guidance items as mentioned in (i) above, quarantine stations will instruct importers

to pre-confirm whether foods to be imported contain any of the pharmaceutical ingredients regulated under the Act on Securing Quality, Efficacy and Safety of Pharmaceuticals, Medical Devices, Regenerative and Cellular Therapy Products, Gene Therapy Products, and Cosmetics (the Act No. 145 of 1960) by referring to materials or information obtained from producers. When they do not contain pharmaceutical ingredients, importers are instructed to check their safety as foods for human consumption.

Quarantine stations will promote pre-import guidance and try to prevent import of foods violating the Act from occurring by dispatching their staff members to international exhibitions for consultations held by their associated organizations, cooperating with such organizations, and improving the system to implement pre-import guidance.

Quarantine stations will encourage importers, through their websites and/or seminars, to consult with import foods counselors of a quarantine station before they import foods for the first time or foods falling under the same category as those that have violated the Act or caused any sanitation problem in the past, and thereby will further promote the pre-import guidance.

When the results of voluntary inspections have been verified in the course of the pre-import guidance, those results will be utilized when quarantine stations check imported foods with import notification documents from the standpoint of promoting voluntary inspection before importation.

The results of pre-import guidance will be shared among quarantine stations to promote effective monitoring and guidance.

(iii) When a violation is identified through pre-import guidance

When a food being imported by an importer has been proved, through a pre-import safety check by the importer, not to comply with the Act, the relevant quarantine station will instruct the importer to take appropriate measures to make the food comply with the Act and also direct the importer to postpone the importation until the violating state has been rectified.

Even if the food is proved, through document check, etc., to be in compliance with the Act as a result of the rectification, the quarantine station will, when necessary, instruct the importer to carry out an testing to verify that the food is actually meeting the standards.

(iv) Voluntary inspection

As for any food imported into Japan for the first time, the relevant quarantine station will thoroughly instruct the importer to carry out voluntary inspections with respect to inspection items required to verify that the food is in compliance with the Act in accordance with the standards and with respect to additives used in the product.

Meanwhile, in the case where the food is to be imported on a regular basis, the importer will be instructed to carry out voluntary inspections in accordance with the guidance as mentioned in (i)

above by referring to the standards and by checking additives used in the food at regular intervals and also taking into consideration confirmed violations of similar foods.

(v) Preparation and maintenance of records of imported foods

Based on the "Guidelines concerning Preparation and Retention of Records by Food Business Operators, based on Provisions in Paragraph 2, Article 1-3 of the Food Sanitation Act" attached to the "Notification concerning the Guidelines concerning Preparation and Retention of Records by Food Business Operators based on Provisions in Paragraph 2, Article 1-3 of the Food Sanitation Act," FS Notification No. 0829001, dated August 29, 2003, issued by the Director General of the Department of Food Safety, Pharmaceutical and Food Safety Bureau, MHLW, importers will be instructed to properly prepare and maintain records of the importation, sales and other details of the imported foods in order to allow the quarantine stations to monitor the conditions of importation and distribution of those foods at all times. Importers will also be instructed to maintain such information in a way that they will be able to provide the information immediately to relevant quarantine stations and local governments should any violation of the Act be identified.

Further, in order to prevent any violating foods from human consumption, quarantine stations will instruct importers to provide such records as notified in the "Guidelines concerning the Implementation of "the Imported Foods Monitoring and Guidance Plan for FY 2016" (ESI Notification 1007 No. 1, dated October 7, 2016, issued by the Director of Imported Food Safety Office, Inspection and Safety Division, Department of Environmental Health and Food Safety, Pharmaceutical Safety and Environmental Health Bureau, MHLW) so that quarantine stations will be able to carry out distribution surveys and the recall of violating foods swiftly upon detection of any violation through monitoring inspections.

(vi) Enhancement of knowledge of food safety among importers, customs brokers and bonded warehouse operators

Quarantine stations will hold seminars not only for importers but also for customs brokers and bonded warehouse operators to provide information about guidance items (i) to (v) above and will dispatch their staff members to seminars held by their associated organizations, with the aim to improve the business operators' knowledge about food safety and thereby to ensure the safety of imported foods.

Meanwhile, quarantine stations will strive to enhance the knowledge of importers, for example, by prompting importers to consult in advance with local governments having jurisdiction over the area where their places of business are located to seek advice on labelling requirements such as proper indication of expiration dates.

(4) Responses upon detection of a violation

The quarantine station, the MHLW and relevant local governments will, in cooperation with each other, instruct the importer to promptly abandon or recall the violating food and at the same time direct the importer to investigate into the cause of the violation and take appropriate preventive measures to secure the safety of imported foods in accordance with the following procedures. In addition to these responses, other necessary measures including the reinforcement of inspection on importation will be introduced:

- (i) When a violation is detected through the inspection on importation or any other procedures:
 - a. In the case where the violating food has not yet cleared customs:

The relevant quarantine station will instruct the importer to discard or otherwise dispose of the violating food and to report on the progress of such disposal.

Meanwhile, the MHLW will introduce necessary measures including the reinforcement of inspection on importation.

b. In the case where the violating food has already cleared customs:

The relevant prefectural government having jurisdiction over the area where the place of business of the importer is located will order the importer to recall or otherwise dispose of the violating food and to report on the progress of such disposal.

In order to ensure the efficient implementation of the recall or any other disposal by the importer, the relevant quarantine station will report to the MHLW in a timely manner the lot numbers of the violating food products, the name and address of the importer and other relevant information (hereinafter referred to as the "violating food information").

Meanwhile, the MHLW will provide the violating food information to the relevant local government that has jurisdiction over the area where the place of business of the importer is located, and will take other necessary measures including the reinforcement of inspection on importation.

The quarantine station will, while directing the discard or other disposal of the violating food as temporary measures, instruct the importer to follow as directed by the prefectural government having jurisdiction over the area where the place of business of the importer is located.

In addition to these response measures, the MHLW will, in accordance with the provisions of Paragraph 1, Article 12 of the Consumer Safety Act (the Act No. 50 of 2009), strive to ensure the sharing of the relevant information with the Consumer Affairs Agency.

(ii) When a violation is detected through any inspection during the domestic distribution process:

Upon notification from any local government of any violating import food detected in the domestic distribution process as a result of sampling inspections (sampling or inspection based on the provision of Article 28, Paragraph 1 of the Act) and/or voluntary inspections by the distributor, etc., the MHLW will provide the violating food information to quarantine stations and, based on the information, will take necessary measures including the enhancement of inspection on importation.

Should there be any reported health damage originating from the imported food, the MHLW will make prompt notification to quarantine stations in the case of a food before importation and to local governments in the case of a food, etc. already released into the domestic market and at the same time will take necessary measures to prevent further expansion of the damage.

(iii) Instructions, etc. to importers for the prevention of the recurrence

In order for the prevention of the recurrence of violations, quarantine stations will require the importer who has violated the Act to report on the following:

- a. Investigation and report of the cause of the violation Quarantine stations will require the importer to investigate and report into the cause of the violation, will give instructions to the importer to prevent recurrence of law violations. If the cause is not identified after three months from the detection of the violation, quarantine stations will require the importer to report on the progress of its investigation.
- b. Report of the results of the rectification of the cause before resumption of importation Before allowing the resumption of the importation of the food in question, quarantine stations will confirm the rectification of the cause of the violation through the investigation as mentioned in a. above. If necessary, quarantine stations will verify the rectification of the cause by referring to field investigations conducted by the importer in the exporting country and/or other inspections carried out by the exporting country and will also request for a report on the results of the rectification.

(iv) Prohibition or suspension of the business of importers based on the provisions of Paragraph2, Article 55 of the Act

From the standpoint of ensuring food safety, the MHLW may order the prohibition or suspension of the business of importers who have repeatedly committed violations or importers importing foods causing or that may cause damage to the public health, in order to have them rectify the cause of the violation and take preventive and any other measures necessary from a sanitary viewpoint.

In addition, as for importers whose violation rate is almost in excess of 5 % and who may be subjected to the disposition by prohibition or suspension of business, the MHLW will require them to submit explanations about their preventive measures and will provide guidance so that no more violations will be committed by them, in accordance with the "Guidelines for the Prohibition or

Suspension of Business of Importers under Paragraph 2, Article 55 of the Act" attached to the "Notification concerning the Prohibition or Suspension of Business of Importers under Paragraph 2, Article 55 of the Act", FS Notification No. 0110003 dated January 10, 2006 issued by the Director General of the Department of Food Safety, Pharmaceutical and Food Safety Bureau, MHLW.

Quarantine stations will strengthen monitoring inspections over food products imported by such importers in accordance with the seriousness of the violations and will also conduct the verification of the preventive measures introduced by the importers.

(v) Indictment of malicious cases

Quarantine stations will indict cases deemed as amounting to criminal offences such as the submission of a false import notification and illegal importation of foods violating or highly likely to violate the Act and will release the information about such indictment in a timely manner.

(vi) Publication of violations

In order to alert the public against food sanitation hazards, the MHLW will promptly publish on the website the name of the importer who has violated the Act or violated any action taken under the Act (except for importers whose violation is of minor nature and who have rectified the violation immediately) and the details of the violating food imported by the importer (as for the names of violating importers, the publication period will be limited to one year) in accordance with the provisions of Article 63 of the Act. In addition to the publication of the names of violating importers, the progress of the response measures including the disposal, recall, etc., of violating food products, the details of corrective actions and the causes of the violations will also be published as soon as such information becomes available.

- (5) Promotion to exchange information and opinions between involved parties (risk communication) By utilizing the websites, their official SNS (food safety information twitter, etc.) accounts and any other means, the MHLW and quarantine stations will actively provide the general public with easy-to-understand information about efforts for ensuring the safety of imported foods, and will hold sessions for information exchange and facilitate risk communication.
 - (i) Provision of information about the monitoring plan, etc.

Quarantine stations will communicate the notices concerning the monitoring plan, inspection orders, the enhancement of inspections and other measures widely among importers, customs brokers and bonded warehouse operators with an aim to facilitate the smooth implementation of the monitoring and guidance under the Plan.

The MHLW will also make public such information as concerning the monitoring plan, the

issuance of inspection orders, the enhancement of inspections and other measures.

(ii) Provision of information concerning bilateral discussions and on-site inspections

The MHLW will publish information concerning bilateral discussions and on-site inspections that have been held or conducted in order to promote sanitary control measures at the stage of exporting countries, including discussions under the "Memorandum on Japan-China Food Safety Promotion Initiative."

(iii) Announcement of monitoring results under the Plan

The MHLW will publish the summary report of the progresses and the results of monitoring inspections carried out under this Plan and inspections conducted in response to inspection orders, etc., the yearly trends of the results of its monitoring and guidance and the summary report of the monitoring and guidance over importers and the results around August of the following fiscal year. Meanwhile, interim report of the first half of this fiscal year (from April to September) will be published around December.

(iv) Efforts to facilitate risk communication about food safety

The MHLW will introduce a public comment process to gather opinions about the draft Monitoring and Guidance Plan next fiscal year. In addition, as risk communication about food safety, the MHLW will hold sessions for information exchange in cooperation with local governments and other concerned ministries and agencies, and concerned bodies, as well as will provide consumers, business operators, etc. with information about the details of the Monitoring and Guidance Plan and the details of its monitoring and guidance by utilizing the website and official SNS of the MHLW (food safety information twitter, etc.), and thereby striving for mutual understanding on efforts and knowledge related to food safety.

(v) Others

Quarantine stations will strive to gain public understanding of the actual conditions of monitoring and guidance on imported foods through such activities as observation tours of quarantine stations for general consumers.

(6) Other activities necessary for the implementation of monitoring and guidance

(i) Development and skill enhancement of human resources in charge of food safety

The MHLW will hold seminars and training sessions to improve the knowledge and skills concerning food safety for food sanitation inspectors engaging in monitoring, guidance, testing and inspection of foods at quarantine stations.

(ii) Evaluation of tests and inspections of foods carried out by quarantine stations

Based on advice from the MHLW's regional offices, the MHLW will systematically carry out the evaluation of the management of the tests and inspections at quarantine stations and will provide instructions in order to ensure the proper implementation of monitoring inspections and other related operations by quarantine stations.

Schedule 1

Schedule 1)	m . 1 . 1 . a
Food type	Category of inspection items*1	Number of inspection	Total number of Inspection
rood type	Category of hispection items 1	specimens*2	specimens*3
	Antibacterial substances	•	specimens 5
		2,200	
Livestock foods	Residual agricultural chemicals	1,300	
Beef, pork, chicken, horse meat,	Additives	100	4,730
poultry meat, and other meats	Pathogenic microorganisms	700	,
,	Standards for constituents	400	
	Radiation irradiation	30	
Processed livestock foods	Antibacterial substances	2,000	
Natural cheeses, processed meat	Residual agricultural chemicals	1,800	
products, ice cream, frozen	Additives	1,200	10,800
products (meat products), and	Pathogenic microorganisms	3,700	
other products	Standards for constituents	2,100	
	Antibacterial substances	1,800	
	Residual agricultural chemicals	1,700	
Seafood products	Additives	300	
Bivalves, fish, crustacea	Pathogenic microorganisms	1,500	5,920
(shrimps, prawns, crabs) and	Standards for constituents	500	0,020
other products	GMOs	60	
	Radiation irradiation	60	
Processed seafood	Antibacterial substances	3.000	
Processed fish products (fillet,		-,	
dried or minced fish, etc.), frozen	Residual agricultural chemicals	3,200	
products (aquatic animals and	Additives	1,600	18,800
fish), processed fish roe products,	Pathogenic microorganisms	5,500	
and other products	Standards for constituents	5,500	
	Antibacterial substances	2,400	
	Residual agricultural chemicals	11,000	
Agricultural foods	Additives	900	
Vegetables, fruit, wheat, barley,	Pathogenic microorganisms	1,400	19,000
corn, beans, peanuts, nuts, seeds,	Standards for constituents	400	15,000
and other products	Mycotoxins	2,300	
	GMOs	500	
	Radiation irradiation	100	
	Antibacterial substances	600	
Processed agricultural foods	Residual agricultural chemicals	7,200	
Frozen products (processed	Additives	3,700	
vegetables), processed vegetable	Pathogenic microorganisms	2,000	
products, processed fruit	Standards for constituents	3,400	20,950
products, spices, instant noodles,	Mycotoxins	3,300	
and other products	GMOs	300	
-	Radiation irradiation	450	
Other foods	Residual agricultural chemicals	1,100	
Supplements, soups, seasonings,	Additives	2,600	
sweets, edible oils, fat, frozen	Standards for constituents	1,200	6,000
products, and other products	Mycotoxins	1,100	
• •	Residual agricultural chemicals	100	
Drinks and beverages Mineral water, soft drinks,	Additives	1,100	
alcoholic beverages, and other	Standards for constituents	,	2,000
products		700	
•	Mycotoxins	100	
Additives Equipments, containers and	Standards for constituents	1,800	1,800
packages, Toys		,	,
	Antibacterial substances, residual		
Foods subject to enhanced	agricultural chemicals, additives,		
inspection*3	pathogenic microorganism, standards for	10,000	10,000
mobection o	constituents, mycotoxins, GMOs,		
	radiation irradiation, Removal of SRMs		
Overall total*2			100,000

- *1: Examples of inspection items
- $\cdot \ Antibacterial \ substances; \ antibiotics, \ synthetic \ antibacterial \ agents, \ hormone \ preparations, \ and \ others$
- ${\bf \cdot} \ Residual \ agricultural \ chemicals: or gan ophosphorus, or gan och lorines, carbamates, \ pyrethroids, \ and \ others$
- $\boldsymbol{\cdot} \ \text{Additives: preservatives, food coloring, sweeteners, antioxidants, antimold agents, and others}$
- Pathogenic microorganisms: enterohemorrhagic Escherichia coli O26, O103, O104, O111, O121, O145,, and O157, Listeria monocytogenes, etc.
- Standards for constituents: items defined in the standards for constituents (such as the number of bacteria, coliform bacteria, and radioactive materials), shellfish poisons (diarrheic shellfish poisons, paralytic shellfish poisons), and others
- · Mycotoxins: aflatoxin, deoxynivalenol, patulin, and others
- · GMOs: Genetically modified organisms whose safety has not yet been certified
- ${\boldsymbol{\cdot}}$ Radiation irradiation: existence of radiation irradiation
- *2: The total numbers of specimens are approximate aggregations of the numbers of inspections in the relevant inspection categories, such as antibacterial substances and residual agricultural chemicals.
- *3: Additional inspections conducted during the implementation of the plan, based on the occurrence of violations and overseas information at the time of importation.

Schedule 2

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	Risk factors at the time of importation	Items to be checked in advance	Items to be checked regularly (including at the time of	Items to be checked during the transportation and
Foods in	(typical examples)Containing hazardous or	Taking measures to	first importation) • Ensuring that no	storage processes • Whether any
	toxic materials in the food Mixing with rotten or deteriorated matter, or unclean or foreign matter	raking measures to prevent hazardous or toxic materials from being included at the point of receiving raw material and manufacturing and processing process	hazardous or toxic materials are included, by regular testing and inspection	corruption or deterioration occurred due to accidents or improper temperature control Whether the food processed by salting or other measures is stored outdoors for a long time Whether the any contamination occurred with pesticides, etc. used in the warehouse
	Contamination by pathogenic microorganisms	Taking measures to prevent contamination by pathogenic microorganisms	• Ensuring that no pathogenic microorganisms are present through regular testing and inspections	 Whether proper temperature control is implemented to prevent harm due to the growth of microorganisms
	Use of unapproved additives Use of additives for unapproved purposes, or the use of additives that does not conform with the standards for their use, such as overuse	 Ensuring that no unapproved additives are used, including those used for raw material Ensuring that additives that do not comply with the standards are not used, and that the appropriate amount is used 		
	Non-conformity with standards (soft drinks, meat products, frozen foods, and other products)	etc. is conducted (excluding those for controlling germination of potatoes) • Asking manufacturers and producers to provide the formal names and percentages of raw materials and additives used in the manufacturing process and the final products • Ensuring that the final product conforms with the Food Sanitation Act by testing and inspection, as necessary	Ensuring that no change has been made in the manufacturing process and the raw materials Ensuring conformity with the standards for constituents, by regular testing and inspection Ensuring compliance with the Food Sanitation Act, by checking the final products	Compliance with storage standards Checking whether any accident has occurred
	• GMO foods whose safety has not been certified	· Whether or not there is a need for safety review among food derived from genome editing technology	Periodic confirmation of the existence of food derived from genome editing technology Confirmation by prior consultation if it is a food derived from genome editing technology	

Agricultural products and related processed foods	Mycotoxins such as aflatoxin and patulin (cereals, beans, spices, apple juice, etc.)	• Taking measures to prevent mold from growing at the time of ingathering and transportation/storage	• Ensuring that no mycotoxins are present by regular testing and inspection	• Whether proper control of temperature and humidity is carried out to prevent the growth of mold
	Natural poisons such as cyanogenic glycosides	Checking whether any natural poisons are present in the food Measures should be taken to remove any natural poisons during the manufacturing, processing and other processes Taking measures to prevent any hazardous or toxic plants from being included	• Ensuring that no natural poisons are present by regular testing and inspection	
	• Radioactive contamination (mushrooms, processed concentrated berries, herbs, etc)	• Ensuring that the harvesting area is not contaminated by radioactivity	Checking the level of radioactivity by regular testing and inspection	
	Pathogenic microorganisms such as Enterohemorrhagic Escherichia coli O157 (fresh vegetables)	Taking measures to prevent contamination by pathogenic microorganisms	• Ensuring that no pathogenic microorganisms are present by regular testing and inspection	Whether proper temperature control is carried out to prevent harm due to the growth of any microorganisms
	• Residual agricultural chemicals	Checking how agricultural chemicals are used Raw materials of processed foods must conform with residue standards	 Ensuring compliance with proper use and dosage of agricultural chemicals, before and after ingathering Ensuring that residual agricultural chemicals are below proper levels, by regular testing and inspection 	Checking whether any agricultural chemicals were used after ingathering
	• GMO foods whose safety has not been certified (corn, papaya, etc.)	Checking whether GMO food has been approved Taking measures to prevent any uncertified GMO food from being included	• Ensuring that no GMO food whose safety has not been certified is included through regular testing and inspection	Whether proper control is carried out
	• Use of additives that may mislead consumers in the determination of quality and freshness (fresh vegetables)	• Ensuring that no colorant, bleach, or other additives that may mislead consumers in the determination of quality or freshness have been used	Checking the types of additives used through regular testing and inspection	

Livestock products and related processed foods	• Pathogenic microorganisms such as Enterohemorrhagic Escherichia coli O157 and listeria (meat, natural cheeses, etc.)	Taking measures to prevent contamination by pathogenic microorganisms	• Ensuring that no pathogenic microorganisms are present through regular testing and inspections	• Whether proper temperature control is implemented to prevent harm due to the growth of microorganisms
	• Radioactive contamination (reindeer meat, beef extracts, etc.)	• Ensuring producing area is not contaminated by radioactivity	• Checking the level of radioactivity by regular testing and inspection	
	• Errors concerning health certificates (meat and meat products) (milk and dairy products)	Checking each item on the health certificate issued by the governmental agency of the producing and/or exporting country		• Ensuring that a complete health certificate is attached
	Bovine spongiform Encephalopathy(BSE) (beef and beef-derived products)	 The producing area is not a country or area from which import is prohibited No specified risk material (SRM) is included in the product No beef, etc. originated from countries or areas from which import is prohibited is included or used. 		
	Bovine spongiform encephalopathy (mutton, goat meat, etc.)	 No BSE animal has been found in the producing area No specified risk material (SRM) is included in the product No mutton, goat meat, etc. originated from countries prohibited or areas from which import is included or used. 		
	 Residual agricultural chemicals, veterinary drugs, and feedstuff additives 	Checking how agricultural chemicals, veterinary drugs and/or feedstuff additives were used Raw materials of processed foods must conform with residue standards	 Checking compliance with proper dose, administration, and drug holidays for veterinary drugs and feedstuff additives Checking levels of residual agricultural chemicals, veterinary drugs, and feedstuff additives, by regular testing and inspection 	
	 Use of additives that may mislead consumers in the determination of quality and freshness (meat) 	 Ensuring that no colorant or other additives that may mislead consumers in the determination of quality or freshness have been used 	 Checking the types of additives used through regular testing and inspection 	

Seafood and processed seafood	Pathogenic microorganisms such as Vibrio parahaemolyticus (fillet, shelled and/or peeled fish and shellfish to be eaten raw) Non-conformity with	• Taking measures to prevent contamination by pathogenic microorganisms in cleaning water used at processing plants, etc. • Compliance with processing standards • Checking whether the	• Ensuring that no pathogenic microorganisms are present through regular testing and inspections	Compliance with storage standards Whether proper temperature control is carried out to prevent harm due to the growth of any microorganisms Compliance with
	standards for constituents, standards for processing, and standards for storage for oysters for raw consumption		with the standards for constituents by regular testing and inspection	storage standards
	• Diarrheic shellfish poisons or paralytic shellfish poisons (shellfish)	Checking that clams are gathered in sea areas where proper monitoring of shellfish poisoning is implemented	Ensuring that no shellfish poisons are present by regular testing and inspection	
	• Mixing with poisonous Blowfish	 Ensuring that only fish of the approved type(s) are imported Taking measures to prevent different types of blowfish from being mixed in, through proper identification of fish types 		 Checking the certificates issued by the governmental agency of the exporting country Ensuring that no different types of blowfish are included, through proper identification of fish types
	• Errors concerning health certificates (oysters for raw consumption and pufferfish)	Checking each item on the health certificate issued by the governmental agency of the producing		• Ensuring that a complete health certificate is attached
	Mixing with poisonous fish such as fish with ciguatoxin (southern groupers, parrot fish, barracudas, etc.)	Checking the seas where the fish are caught Taking measures to prevent poisonous fish from being mixed in, through proper identification of fish types		• Ensuring that no poisonous fish are included, through proper identification of fish types
	• Residual veterinary drugs and feedstuff additives	foods must conform with the residue standards	Checking compliance with proper dose, administration, and drug holidays for veterinary drugs and feedstuff additives Checking the levels of residual veterinary drugs and feedstuff additives, by regular testing and inspection	
	• Use of additives that may mislead consumers in the determination of quality and freshness (fresh fish and shellfish)	• Ensuring that no colorant, carbon monoxide or other additives that may mislead consumers in the determination of quality or freshness have been used	Checking the types of additives used, by regular testing and inspection	Checking the color of the product (scarlet, etc.)
	• Histamine	Checking at the point of receiving raw material Temperature control must be proper during the manufacturing, processing and other processes.	Checking the level ofhistamine, by regular testing and inspection	Whether proper temperature control is carried out to prevent harm due to the histamine formation

Health foods in general	• Containing drug substance	• Ensuring that no drug substances designated by the Pharmaceutical Affairs Act are included	Ensuring that no drug substance is included by testing and inspection	
	· Containing hazardous or toxic substance	Checking the history of ingestion in the exporting country Checking the cases of health damage		
Additives and their preparation	Use of unapproved additive Non-conformity with the standards	Checking the correct names of the additives and their types of source materials and extractants Checking the formal names and content rates if additive preparation is used Ensuring that no unapproved additives are used Ensuring that the product conforms to the related standards, such as standards for constituents and manufacturing standards GMO technology whose safety has not been certified shall not be used.	Ensuring conformity with the standards for constituents, by regular testing and inspection	Checking compliance with storage standards
Equipments, containers and packages, and toys	• Non-conformity with standards	Checking the materials, shape, colors and patterns, targeted ages, and the purpose of use Ensuring that the product conforms with related standards, such as general standards for raw materials, standards for each material, standards for each purpose of use, and manufacturing standards	• Ensuring that the raw materials conform with general standards for raw materials and standards for each material, by regular testing and inspection	
	• Inclusion of substances other than the positive list (Instruments and containers and packaging made of synthetic resin)	• Must be a substance listed on the positive list	• Ensuring that positive list regularly	