

Allergen Labelling Issues in Global Tourism

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Zensho's Vision

Taking Responsibility for the Stability and Development of Human Society,
Helping Eradicate Hunger and Poverty
from the World



Ogawa Kentaro

Chairman of the Board and CEO
Zensho Holdings Co., Ltd.



Providing the world with safe,
delicious food at affordable prices

As the top food service enterprise in Japan, Zensho plays a vital role in the nation's food provision infrastructure. Both in Japan and overseas, Zensho serves a diverse range of great-tasting meals at its restaurants in the *gyudon* (beef-rice bowl), family dining and fast food categories. Fully committed to providing safe and delicious food, Zensho conducts meticulous food management not only in restaurants but also in all other

processes including ingredient procurement, manufacturing and logistics. To conduct this with complete accountability, Zensho has created a unique source-to-customer business model and promotes it for continuous innovation in every process from design planning to operation. Zensho's mission is to provide safe, delicious food to as many people as possible, throughout the world.



Company Overview

ZENSHO SUMMARY (as of March 31, 2024)

Consolidated sales

..... 965.7 billion yen

Consolidated operating profit

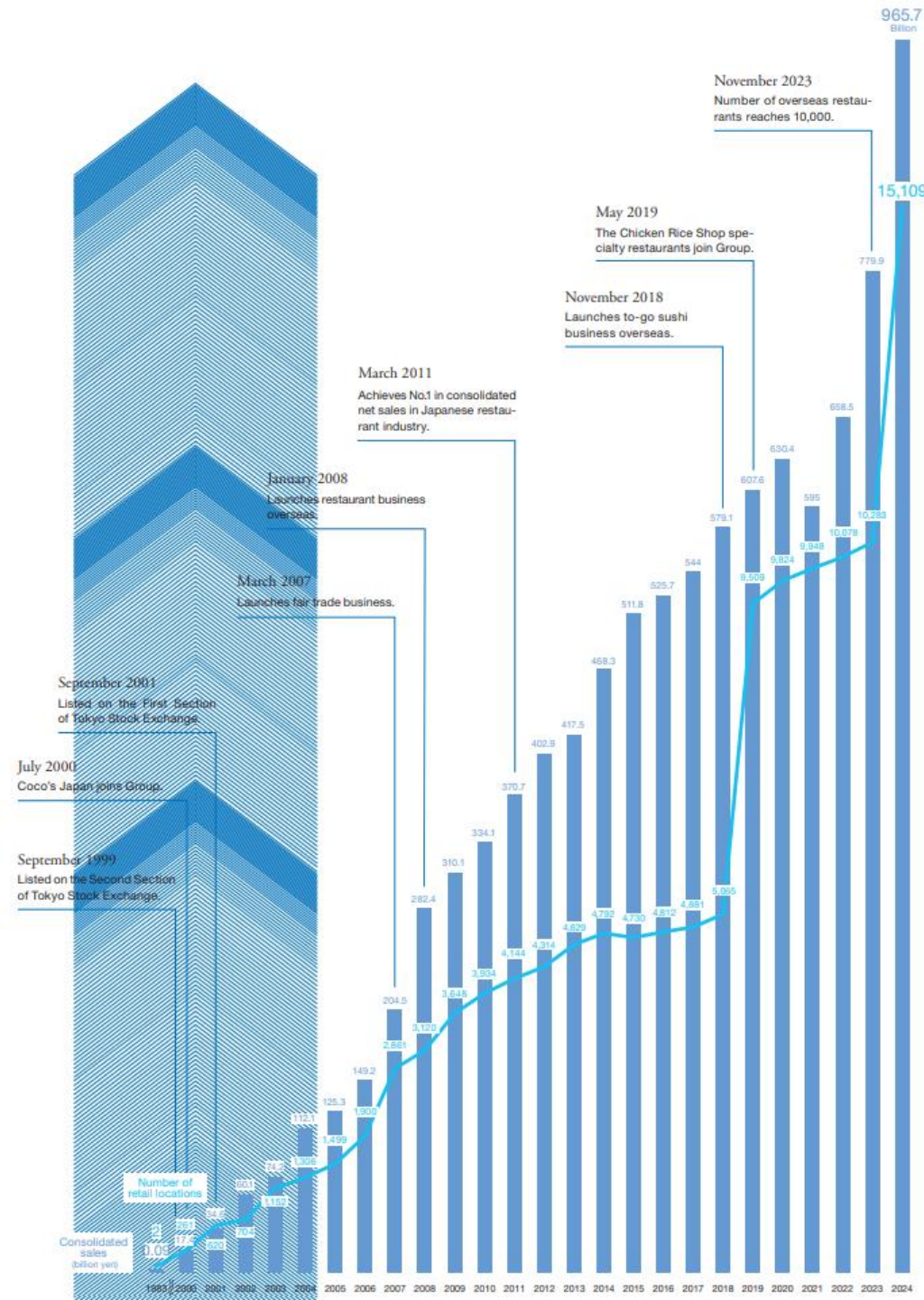
..... 53.7 billion yen

Number of retail locations

..... 15,109

Newly opened retail locations

..... 971 (from April 1, 2023 – March 31, 2024)



Safe and delicious food for consumers



Zensho's Food Safety Initiative

Zensho's Strict Safety Standards

— Group Food Safety Standards Division

Zensho regards food safety as its highest priority. It set up a Food Safety Pursuing Unit (now the Group Food Safety Standards Division) in 2005, followed by a Central Research Center in 2006. The center is equipped with state-of-the-art analysis devices like no other in Japan's food service industry. The Central Research Center performs a range of inspections and analyses, including checks for residual agrochemicals in agricultural, livestock and fishery products, veterinary drugs, hazardous substances such as heavy metals, genetically modified crops and radioactive materials. When we newly procure ingredients, whether from Japan or overseas,

the center performs rigorous safety testing. It confirms that the farms and production factories meet Zensho Group's own food safety standards. Its staff travel to the site to carry out inspections in person. They perform independent food safety tests for agrochemical residues and other potential hazards and analyze soil and water quality to ensure high safety standards are met.

Further, when domestically produced agricultural or marine products are used in Zensho Group's outlets, we carry out on-going tests for radioactive residue to ensure that they meet our own stringent safety standards.



Scientific Management of Food Safety

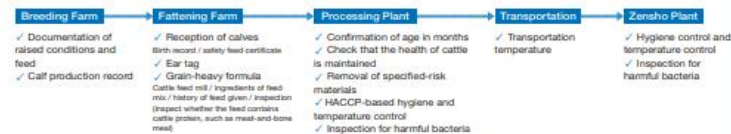
— Zensho Safe-feed Cattle Program

There are various ongoing threats to food safety worldwide, such as incidents of "mad cow disease" (bovine spongiform encephalopathy, or BSE), residual agrochemicals and radioactive contamination. Zensho ensures the safety of its food using strict standards so that customers can always enjoy delicious food with peace of mind.

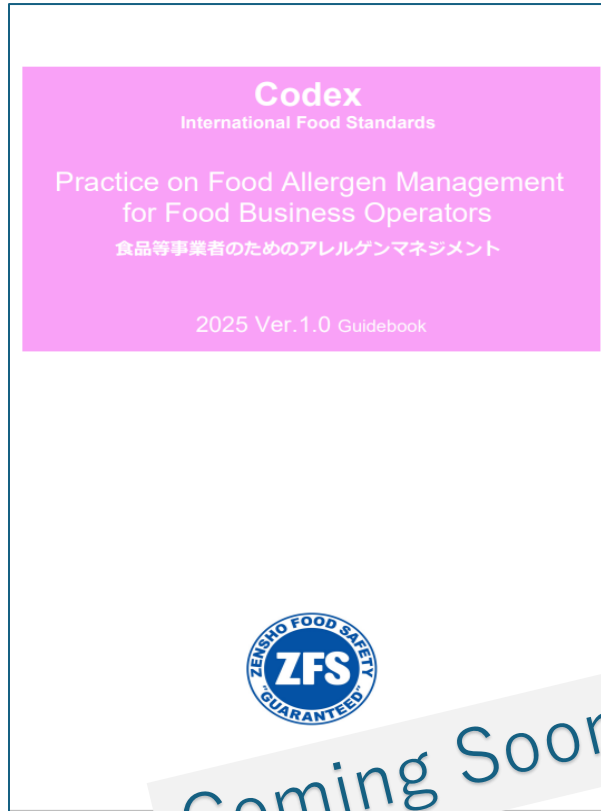
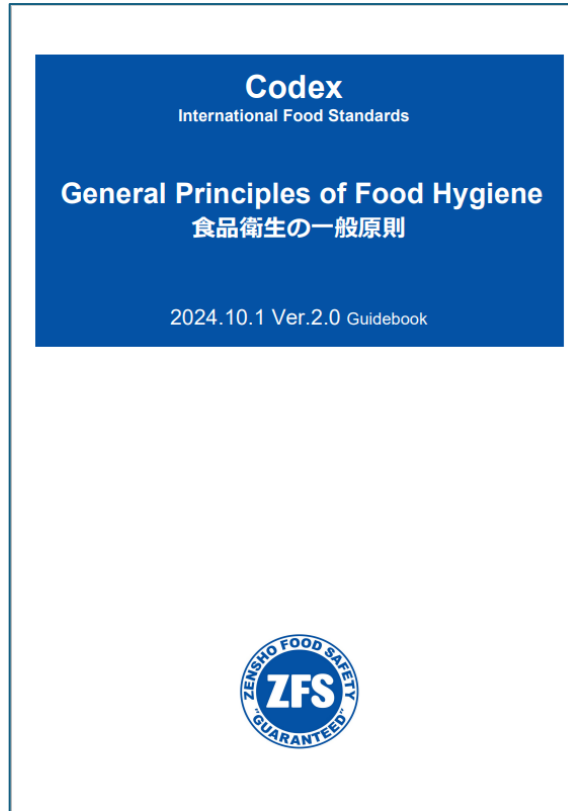
One example of Zensho's safety commitment involves U.S. beef. In order to procure BSE-free beef, Zensho has introduced its own beef management program called Zensho Safe-feed Cattle (SFC). This program involves documenting the dates and locations of cattle births and ensuring that the animals

have not been given any feed that might cause BSE infection. These healthy cattle are then certified as SFC. The program is based on Zensho's ability to ascertain the history of livestock destined for Zensho at a supplier's ranch or processing plant. This history includes each steer's life history from its birthplace till its shipment. Under the company's SFC program, Zensho employees inspect production sites in person to perform certification. They carefully check for legal compliance at farms and processing plants including inspection systems to ensure the removal of specific risk material. Only beef checked for safety reaches our Zensho kitchens.

Zensho's Own Food Safety Control Program



Our Food Safety



Coming Soon !



Global Tourism ?

Cross-Country Movement of People and Food Allergy Labelling



Now that international travel has resumed...

Narita Airport
22million /year (2024)



Sydney Airport
25million /year (2024)

What should we do to prevent accidents caused by misidentified food allergens?

[*空港運用状況 | 空港運用・整備 | 成田国際空港株式会社](#)

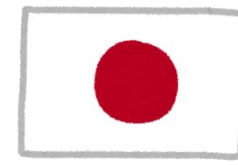
[*Sydney Airport Traffic Performance Q4 2024 Final.pdf](#)

We Live in Such a Big World

April , 2025

	Food Allergens to be labelled																	
	Crustacean Shellfish	Egg	Milk	Peanut	Tree Nuts	Wheat	Soy	Fish	Cereals w/ Gluten	Sulfites	Sesame	Molluscan Shellfish	Lupin	Buck wheat	Celery	Mustard	Bee Pollen/ Propolis	Royal Jelly
CODEX	×	×	×	×	×	×	×	×	×	×								
AU/NZ	×	×	×	×	×	×	×	×	×	×	×	×	×				×	×
Canada	×	×	×	×	×	×	×	×	×	×	×	×				×		
China	×	×	×	×	×	×	×	×	×									
EU	×	×	×	×	×	×	×	×	×	×	×	×	×		×	×		
UK	×	×	×	×	×	×	×	×	×	×	×	×	×		×	×		
USA	×	×	×	×	×	×	×	×		×	×							
Japan	×	×	×	×	×	×								×				

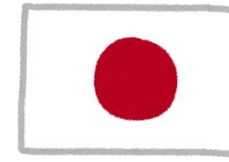
Japanese Example



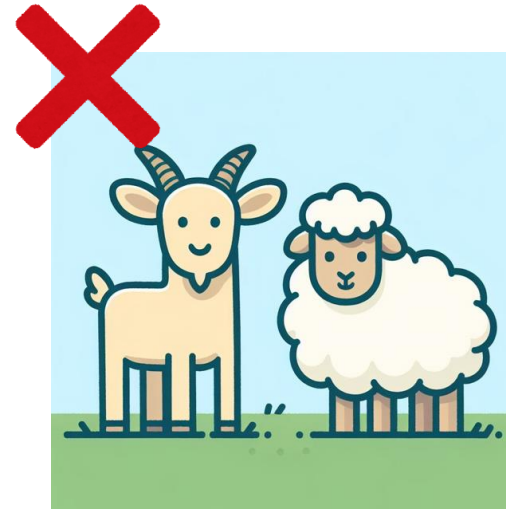
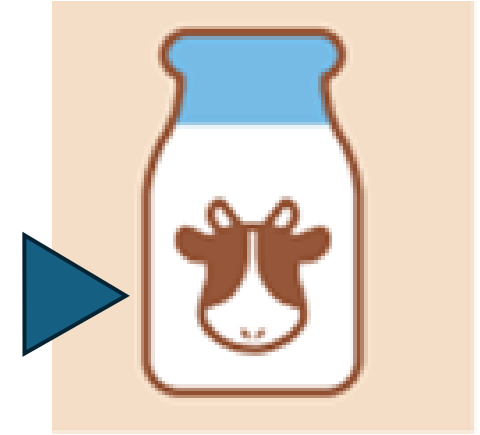
- Japanese food allergen to label are 28!
- 8 foods are **mandatory**, 20 foods are **voluntary**!



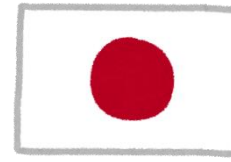
Japanese Example



Japanese food allergen label's 'milk' is



Japanese Example



Japanese food allergen label's 'tree nuts' are



Macadamia



Cashew



Almond



Walnut

They are **not** declared



Pecan



Brazil nut



Pistachio



Pine nut



Hazelnut

My Presentation Title

Allergen Labelling Issues in Global Tourism

What Can We Do?



What can we do?

List of Allergens Included in SUKIYA Items

ATTENTION	<ol style="list-style-type: none">1. This list provides information on the 28 food ingredients with allergens specified by Japanese law (info on almonds to be added) .2. This is the list of 8 (out of 28) specific raw materials that can cause allergic reactions. These materials are used in the meal or can be immixed in the meal during processing or cooking. *13. We process and cook our meals with the greatest care. However, please be aware that cross-contact * can occur since the items are processed and cooked in the same facilities and staff. *Cross-contact: When an allergen is inadvertently transferred from a food containing an allergen to a food that does not contain the allergen.4. The degree of allergenic reactions also vary from person to person and also depend on your current physical condition. When placing your order, we ask that you make the final decision after having taken into consideration all of the above. <p>※We use high quality, 100% domestically-produced rice here at Sukiya. ※1 : The list of the 28 specific raw materials reactions is on our website.</p>
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- This list provides information on the 28 food ingredients with allergens specified by Japanese law.
- This is the list of 8 (out of 28) specific raw materials that can cause allergic reactions.

Food Services' Allergen Labelling

In Japan, many major restaurant chains use the internet to provide allergy information in their own way.



**On the next pages,
I will show you our SUKIYA's self-ordering screen,
And our COCO'S HP!**



Self-Ordering Screen



●...Ingredients used

△...Products containing the allergens are manufactured on the same production line in the raw material factory.

Here!



[How to access information on the 28 specific raw materials]
You can also access our allergen list via the QR code.

Items

Specific Raw Materials

Wheat	Buckwheat	Egg	Milk	Peanut	Shrimp/Prawn	Crab	walnut
							

1	Gyudon	●	-	△	△	-	-	-	-
2	Gyudon w/ 3 Cheeses	●	-	△	●	-	-	△	-
3	Gyudon w/ Mustard Leaf, Cod Caviar & Mayonnaise	●	-	●	●	-	●	-	-
4	Gyudon w/ Grated Yam	●	-	△	△	-	-	-	-
5	Gyudon w/ Bonito Flakes & Okra	●	-	△	△	-	-	-	-
6	Gyudon w/ Green Onion & Raw Egg	●	-	●	△	-	-	-	-
7	Gyudon w/ Grated Radish & Ponzu	●	-	△	△	-	-	-	-
8	Gyudon with Kimchi	●	-	△	△	-	-	-	-
9	Gyudon w/ Spicy Mapo Eggplant	●	-	△	△	-	-	△	-
10	Gyudon w/ Spicy Mapo Eggplant & Soft-Boiled Egg	●	-	●	△	-	-	△	-
11	Gyudon w/ Spicy Mapo Eggplant & Fried Garlic	●	-	△	△	-	-	△	-
12	Gyudon with Cod Caviar Mayo & Cheese	●	-	●	●	-	●	-	-
13	Low Carb Gyudon (*on Tofu)	●	-	△	△	-	-	-	-
14	Low Carb Gyudon w/ Green Onion & Raw Egg	●	-	●	△	-	-	-	-
15	Low Carb Gyudon w/ 3 Cheeses	●	-	△	●	-	-	△	-



Ta:bel

Allergy Information Search Site

Cocos Site Top

アレルギー Ta:bel 検索サイト — Look it up with "Ta:bel"! Eat! —

※ポスト いいね! 16

Filter by category Children's Menu Commendation Hamburger Meat dishes pasta Japanese Rice dishes salad Pizza & Side Menu Lunch Menu Dessert menu Soup Side Order Drink Menu breakfast

Results: 199

*Please note that the information will be updated from time to time. (As of March 25)

Excluding the mark

The menu marked with the mark is the manufacturing process of the ingredients used, and the products containing the selected allergens are produced on the same line.

If you select an allergen, you will see a menu that does not contain that substance

(Multiple selections possible)

ovum	milk	wheat	Buckwheat	Peanuts
shrimp	crab	Walnut	almond	Abalone
squid	salmon roe	orange	cashew nut	kiwi
Beef	sesame	salmon	mackerel	soybean
chicken	banana	pork	Thigh	Yamaimo
Apple	gelatin			

reset

List of allergens

If you select an allergen, you will see a menu that does not contain that substance

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reset

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ovum

milk

wheat

Buckwheat

Peanuts

shrimp

crab

Walnut

almond

Abalone

squid

salmon roe

orange

cashew nut

kiwi

Beef

sesame

salmon

mackerel

soybean

chicken

banana

pork

Thigh

Yamaimo

Apple

gelatin

reset

List of allergens

すべて

Filter by category

Children's Menu

Recommendation

Hamburger

Meat dishes

pasta

Japanese

Rice dishes

salad

Pizza & Side Menu

Lunch Menu

Dessert menu

Soup Side Order

Drink Menu

breakfast

Results: 97

*Please note that the information will be updated from time to time. As of March 25, 2025

Children's Neapolitan

Low allergen children's hamburger plate

Low allergen children's curry

Low allergen children's doria

Low allergen rice flour bread

Low allergen strawberry ice cream

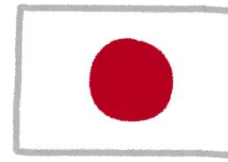
Children's fries (fried in the same oil)

Fried from children (fried in the same oil)

Excluding the mark

The menu marked with the mark is the manufacturing process of the ingredients used, and the products containing the selected allergens are produced on the same line.

PAL?



“May contain” is not allowed, However, as a voluntary cautionary label, Potential reason for contamination can be explained in Japan.

× ‘may contain’

含まれる アレルギー物質 (28品目中)	 小麦	 卵	 乳成分	 牛肉	 大豆
----------------------------	---	--	--	---	--

本商品の製造工場では、えび、かに、くるみを含む製品を製造しています。

The factory where this food was produced also produces food products that contain shrimp, crab, walnut.

本品に含まれるアレルギー物質(28品目中) 大豆・りんご・魚醤(魚介類) ※魚介類の情報含む
--

○本製品に使用しているアサリには、かにが共生しています。

The clams used in this product commonly have crabs living symbiotically inside.

Conclusion



CODE OF PRACTICE ON FOOD ALLERGEN MANAGEMENT FOR FOOD BUSINESS OPERATORS

CXC 80-2020

While the allergens listed above are the most common, other food allergens such as sesame seeds, buckwheat, celery, mustard, molluscs and lupin are recognised as important in many countries. The list of recognised food allergens varies among countries and there is the potential for additional major allergens to be identified in the future. The controls outlined in this Code of Practice (Code) would be similar for any other allergens, and FBOs should apply these as appropriate to their own business requirements and applicable legislation. This includes being aware of the food allergens recognised as important in countries they are exporting their product to, managing those allergens and ensuring the necessary allergen labels are applied.

Codex mentions the differences in allergens between countries when exporting. This issue is **not only for products labeling, but also for the people themselves** who come and go.

Conclusion

In the near future, we will need to create a global standard for allergen labelling.
This is a universal challenge!
“Two-floors” labeling method be considered.

**I know every
country's rules!**



local



local



local



local



local

CODEX Universal allergen

(egg , milk , tree nuts, gluten, crustaceans, fish, peanuts,
soybeans)

Example



Japanese sushi
<Containing allergens>

Wheat, soy, egg,
crustaceans

salmon roe

Universal

Local

Future Allergen Labeling



GENERAL PRINCIPLES OF FOOD HYGIENE

CXC 1-1969

14. PRODUCT INFORMATION AND CONSUMER AWARENESS

OBJECTIVES:

Appropriate information about food should ensure that:

- adequate and accessible information is available to the next FBO in the food chain or the consumer to enable them to handle, store, process, prepare and display the product safely and correctly;
- consumers can identify allergens present in foods; and
- the lot or batch can be easily identified and removed/returned if necessary.

Consumers should be given enough information on food hygiene to enable them to:

- be aware of the importance of reading and understanding the label;
- make informed choices appropriate to the individual, including about allergens; and
- prevent contamination and growth or survival of foodborne pathogens by storing, preparing and using food correctly.

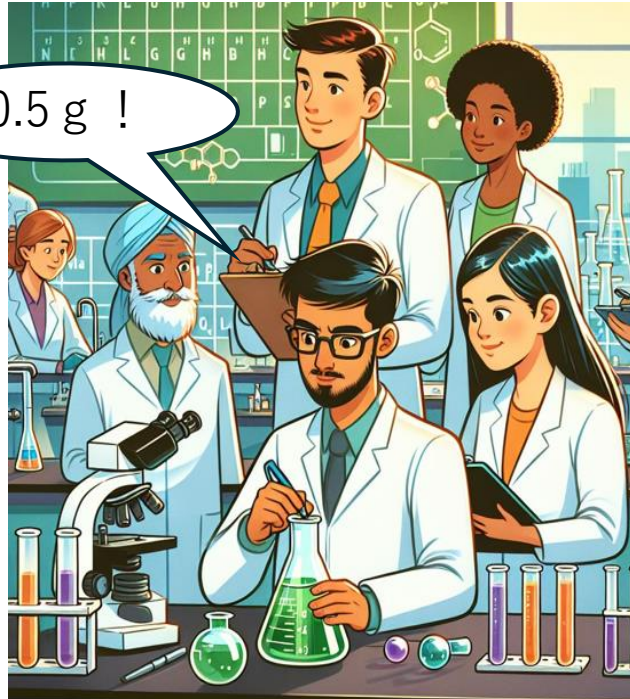
Future Allergen Labeling

Go to a little bit further into the future !

You may eat
up to 1 g of
ovalbumin per day.



0.5 g !



You can eat this!
The ovalbumin
content of this menu
is less than 1g!



Let's make the future world of our children and grandchildren open to everyone, including those with food allergies.



Thank you for your attention !

