

# CARRY-OVER PRINCIPLE





## What are the requirements in various countries?



Carry-over of food additives in the final food product can occur as a result of the use of ingredients that inevitably contain food additives. In practice, food additives are regulated in many countries and there are specific limits established for each food additive to prevent overdose. In Asia, some countries have also established conditions that allow the carryover of food additives. One of the key conditions is that the quantity of the carried-over food additive from the food must not be greater than would be introduced by use of raw materials under proper technological conditions or manufacturing practice.

For most countries which regulate carry-over of food additives, such carryover into infant formulae and follow up formulae is prohibited. Overall, the carry-over principle in most Asian countries is rather similar to the Codex standards, except that labelling requirements and exemptions differ among countries.

## ASIA AT A GLANCE

Presence of Carryover Principle	Labelling Exemption	Countries
Yes	Yes, when carryover additives do not serve any technological function in the food	
	Yes, when carryover additives do not serve any technological function in the food and Carryover additives from Ingredients comprise of less than 25% of the total food	
	Not exempted	
No	No Labelling Provision for Carryover	

## CODEX

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Carry-over of food additives is permitted in the following conditions<sup>1</sup>:

- When the additive is acceptable for use in the raw materials or other ingredients under the Codex standards
- When the amount of additive in the raw material or other ingredients does not exceed the maximum use level specified under the Codex standards
- When the food into which the additive is carried over does not contain the additive in greater quantity than would be introduced by the use of raw materials, or ingredients under proper technological conditions or manufacturing practice

Carry-over of food additives is prohibited for infant formulae, follow-up formulae and formulae for special medical purposes for infants; and complementary foods for infants and young children.

Food additives, carried over into foods at a level less than that required to achieve a technological function **(excluding food additives which cause hypersensitivity)** need not be declared<sup>2</sup>.

## CHINA

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Carry-over of food additives is permitted under the following conditions<sup>3</sup>:

- When the additive is approved for use in the ingredient under GB 2760
- When the amount of additive in the ingredient does not exceed the maximum use level specified under GB 2760
- When the ingredient is used under the condition of normal manufacturing process and when carry-over of the food additive does not result in the final food product containing these food additives at levels which exceed the maximum use level specified under GB 2760
- When the amount of carry-over of additive is significantly lower than would be introduced by direct addition of additives into the food

Food additives, carried over from ingredients which comprise of less than 25% of the total food, which fulfil the above standards and do not serve any technological function in the food need not be declared<sup>4</sup>.

Ingredient which is specially made to be added to a final product and contains permitted food additives that can be carried over to the final food product shall be labelled clearly that this ingredient is manufactured for use in [name of final product].

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<sup>1</sup> General Standard for Food Additives. (2018). Retrieved from: [http://www.fao.org/gsaonline/docs/CXS\\_192e.pdf](http://www.fao.org/gsaonline/docs/CXS_192e.pdf)

<sup>2</sup> General Standard for the Labelling of Prepackaged Foods. (2018). Retrieved from: [http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCXS%2B1-1985%252FCXS\\_001e.pdf](http://www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252FStandards%252FCXS%2B1-1985%252FCXS_001e.pdf)

<sup>3</sup> GB 2760-2014 Standards for Use of Food Additives. (2014). Retrieved from: <https://sppt.cfsa.net.cn:8086/staticPages/E13798C0-F243-4ACB-B541-C4E543349BE5.html>

<sup>4</sup> GB 7718-2011 Rules for Labelling of Prepackaged Food. (2011). Retrieved from: <http://www.nhc.gov.cn/zwgkzt/psp/201106/51950/files/e84256474d1445919246b4a41a87f172.pdf>

## INDIA

Carry-over of food additives is permitted under the following conditions<sup>5</sup>:

- When the additive is acceptable for use in the raw materials or other ingredients under India's regulations
- When the amount of the additive in the raw materials or other ingredients does not exceed the maximum use level specified in India's regulations
- When the food into which the additive is carried over does not contain the additive in greater quantity than would be introduced by the use of raw materials, or ingredients under proper technological conditions or manufacturing practice

Carry-over of food additives is prohibited in infant formulae, follow-up formulae and formulae for special medical purposes for infants; and complementary foods for infants and young children, unless otherwise indicated.<sup>6</sup>

Labelling of carry-over food additives is required within the list of ingredients. A draft regulation issued on 2 July 2019 proposed that labelling of carryover be exempted unless it is in sufficient amount to perform a technological function<sup>7</sup>.

## INDONESIA

Carry-over of food additives is defined as BTP derived from all Food Raw Material, auxiliary materials and / or BTP, but are not technologically functional in the end product.<sup>8</sup>

Carry-over of food additives is prohibited in infant formulae, follow-up formulae and formulae for special medical purposes for infants; and complementary foods for infants and young children, unless otherwise indicated.

Labelling of carry-over food additives is required<sup>9</sup>.

## JAPAN

Carryover is defined as food additives being used in the process of manufacturing or processing of the food ingredients but not used in the process of manufacturing or processing the final food product, and the quantity of such carry over of food additives is lesser than required to serve any technological function.

Labelling of carry-over food additives is not required<sup>10</sup>.

<sup>5</sup> Compendium of Food Safety and Standards (Food Product Standards and Food Additives) Regulation, 2011. (2011). Retrieved from: [https://www.fssai.gov.in/upload/uploadfiles/files/Compendium\\_Food\\_Additives\\_Regulations\\_29\\_03\\_2019.pdf](https://www.fssai.gov.in/upload/uploadfiles/files/Compendium_Food_Additives_Regulations_29_03_2019.pdf)

<sup>6</sup> Food Safety and Standards (Packaging and Labelling) Regulation, 2011. (2011). Retrieved from: [https://www.fssai.gov.in/upload/uploadfiles/files/Packaging\\_Labelling\\_Regulations.pdf](https://www.fssai.gov.in/upload/uploadfiles/files/Packaging_Labelling_Regulations.pdf)

<sup>7</sup> Draft Food Safety and Standards (Labelling and Display) Regulation, 2019. Retrieved from: [https://fssai.gov.in/upload/uploadfiles/files/Draft\\_Notification\\_Display\\_Labelling\\_02\\_07\\_2019.pdf](https://fssai.gov.in/upload/uploadfiles/files/Draft_Notification_Display_Labelling_02_07_2019.pdf)

<sup>8</sup> Food Additives. (2019). Retrieved from: <http://jdih.pom.go.id/showpdf.php?u=WLMn1PeJ5mk7XluZ6xd0LZKuSdRWulfplfWe0fZBFk%3D>

<sup>9</sup> Food Labelling. (2018). Retrieved from: <http://jdih.pom.go.id/showpdf.php?u=Xvat1MwA1KiGebXO6ZpkMU1x0Xxfjp%2F0mVjBDbQGcf%3D>

<sup>10</sup> Guidelines for Food Labelling. (2018). Retrieved from: [https://www.jetro.go.jp/ext\\_images/en/reports/regulations/pdf/foodext2010e.pdf](https://www.jetro.go.jp/ext_images/en/reports/regulations/pdf/foodext2010e.pdf)

## KOREA

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Food additives, carried over into foods at a level less than that required to achieve a technological function need not be declared<sup>11</sup>.

## LAOS

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Regulations on food additives comply with provisions listed under international and ASEAN rules and guidelines, such as Codex<sup>12</sup>.

## MALAYSIA

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Carry-over of food additives is permitted under the following conditions<sup>13</sup>:

- When the additive is permitted to be used in the food ingredients under Malaysia's regulations
- When the proportion of the additive in any ingredient does not exceed the maximum proportion permitted by the regulations
- When the total proportion of the additive in the final product does not exceed the maximum proportion permitted by the regulations
- When the food into which the additive is carried over does not contain the additive in a greater quantity than would be the case if the food were made under proper technological conditions and in accordance with sound manufacturing practice
- When the additive carried over is present in the food at a level that is significantly less than that normally required for the additive to achieve an efficient technological function in its own right

Carry-over of food additives is prohibited for infant formulae and follow-up formulae unless otherwise indicated.

There is no provision on the labelling of carry-over food additives.

## PHILIPPINES

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Carry-over of food additives is permitted under the following conditions<sup>14</sup>:

- When the food additive is permitted for use in the raw materials or other ingredients by Philippines' regulations
- When the amount of food additive in the raw materials does not exceed the permitted maximum level

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<sup>11</sup> Food Labelling Standards. (2018). Retrieved from: [https://www.mfds.go.kr/brd/m\\_211/view.do?seq=14295](https://www.mfds.go.kr/brd/m_211/view.do?seq=14295)

<sup>12</sup> Law on Food. (2013). Retrieved from: <http://www.laoservicesportal.gov.la/index.php?r=site%2Fdisplaylegal&id=99#A14>

<sup>13</sup> Food Regulation 1985. (2018). Retrieved from:

<http://fsq.moh.gov.my/v6/xs/dl.php?filename=730b5042d10be434b44c3165d1ec588b.pdf>

<sup>14</sup> Updated List of Food Additives. (2006). Retrieved from: <https://www2.fda.gov.ph/attachments/article/19772/BC%202006-016.pdf>

- When the food into which the food additive is carried over does not contain the food additive in greater quantity than would be introduced by the use of the ingredients under proper technological conditions or manufacturing practice

Food additives carried over into food at levels less than those required to achieve technological function need not be declared<sup>15</sup>.

## SINGAPORE

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Carry-over of food additives is permitted for any permitted food additives which meets the required description and do not exceed the amount appropriate to the quantity of the ingredient<sup>16</sup>.

Carry-over food additives are required to be declared in the statement of ingredients, as per all food additives and ingredients<sup>17</sup>. Under the Guidelines on the Declaration of Statement of Ingredients<sup>18</sup>, compound ingredients which comprise of more than one constituent, the constituents should be declared in descending order. For example, “soy sauce (water, soybean, black bean, salt, sugar)”.

## TAIWAN

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Labelling of permitted food additives used at levels less than required to achieve technological function need not be declared.

## THAILAND

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Food additives carried over into food at a level sufficient to perform a technological function shall be declared<sup>19</sup>.

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<sup>15</sup> Revised Rules and Regulations Governing the Labelling of Prepackaged Food Products. (2014). Retrieved from: <https://www.fda.gov.ph/attachments/article/194724/AQ2014-0030%20-%20Revised%20Rules%20and%20Regulation%20Governing%20of%20Prepackaged%20Food%20Product>

<sup>16</sup> Regulation 15 (3) of Food Regulations. (2019). Retrieved from: <https://www.sfa.gov.sg/docs/default-source/default-document-library/food-regulations1.pdf>

<sup>17</sup> A Guide to Food Labelling and Advertisements. (2019). Retrieved from: <https://www.sfa.gov.sg/docs/default-source/tools-and-resources/resources-for-businesses/aguidetofoodlabellingandadvertisements.pdf>

<sup>18</sup> Guidelines on the Declaration of Statement of Ingredients. Retrieved from: <https://www.sfa.gov.sg/docs/default-source/tools-and-resources/resources-for-businesses/guidelinesonthedeclarationofthestatementofingredie.pdf>

<sup>19</sup> Labelling of Prepackaged Foods. (2014). Retrieved from: [http://food.fda.moph.go.th/law/data/announ\\_moph/V.English/No.367-\(383\).pdf](http://food.fda.moph.go.th/law/data/announ_moph/V.English/No.367-(383).pdf)