

**Questions and Answers on the JAS (Japanese Agricultural Standards)  
for Organic Plants, Organic Processed Foods, Organic Livestock  
Products and Organic Feeds  
(Preliminary Translation)**

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**I Production Process Manager**  
**1. Production process manager for organic plants**

(Q1-1) What kind of activities are to be carried out by the certified production process managers of the organic products of plant origin?

(Q1-2) In case we harvest 3-4 crops from the same fields in a given year, should we apply for certification of each crop?

(Q1-3) Is there any certificate validity period provided for the certified fields or collection areas?

(Q1-4) Is it possible for the production process administrator for the organic plant products to concurrently act as a grading staff?

(Q1-5) How can we calculate the necessary number of production process managers required for the proper management or control of the fields, in consideration of the number of the fields or the dispersion degree of the fields, etc.

(Q1-6) With reference to 4.1-2)-b) of “Inspection Methods for the Production Process of Organic Plant Products etc., which specifies to “confirmation that the relevant production process management records are related to the relevant production lot”, please let us know how we can verify this?

(Q1-7) Is it possible for the certified production process managers to affix Organic JAS seals to those crops kept in stock, that had been harvested or cultivated before they obtained their certifications.

(Q1-8) In the event of the transfer of business or organizational changes, is it necessary for the succeeding business operator to obtain a new certification for their production process manager?

(Q1-9) With reference to the newly provided Clause 9 of “Technical Criteria for Certifying Domestic or Overseas Production Process Managers of Organic Plants and Organic Feeds (limited to those that have undergone only the process of preparation or sorting), which stipulates that “Provided that any prohibited substances be found mixed in the fields for the reasons not attributable to the certified production process managers etc., and if the amount of such prohibited substances is very small, such prohibited substances are deemed not have been used”, please clarify the purpose or meaning of this newly established provision.

(Q1-10) How should we determine whether the amount of such prohibited substance (found mixed in the fields) is very small, which is specified in Clause 9 of “Technical Criteria for Certification” and the provision 4.1-2) of “Inspection Methods for the Production Process of Organic Plant Products etc.”?

(Q1-11) In case any prohibited substances were used for pest control in a field etc. in accordance with the Plant Protection Act (Act No. 151 of 1950), how would such field (where prohibited substances were used) and the relevant plant products (cultivated by using such prohibited substances) be handled?

(Q1-12) With reference to “Pest control in accordance with Plant Protection Act (Act No. 151 of 1950)”, what kind of pest controls should fall into such category?

(Q1-13) With reference to the agricultural and forestry products specified in the Article 48-2-11 of Regulation for Enforcement of the Act on Japanese Agricultural Standards (Order of the Ministry of Agriculture and Forestry No. 62 of June 9, 1950), that are generally expected to be consumed in more than a year or in less than a year from the shipment in case “use by and best before dates” are not indicated, what are those product items specifically in each case respectively?

(Q1-14) With reference to 7.1 -d) of Technical Certification Criteria for Production Process Managers of Organic Plant Products and Organic Feeds, which stipulates “Handling of a lot found to be non-compliant with JAS 1605 or JAS 1607 after shipment”, as a necessary item to be specified in the “Grading rules”, what should be provided specifically in this grading rule?

## 2. Production Process Managers for Organic Processed Foods

(Q2-1) If we are to make vegetable salads in the supermarket by using organic vegetables and attach Organic JAS logos to them, is it necessary for us to be a certified production process manager?

(Q2-2) Should the production process management be carried out by a single person alone? In case the production process management involves multiple people, should all of them be certified operators?

(Q2-3) Aren't the certified overseas production process managers of organic processed foods allowed to produce and sell organic processed foods, unless they use organic JAS certified ingredients bearing organic JAS seals?

(Q2-4) Is it permissible for the overseas organic certified operators (certified under the grading system of a foreign country, with which Japan has organic equivalency arrangement) to grade plant products, livestock products and processed foods of plant origin, and attach Organic JAS seals to those products by themselves in accordance with their own country's organic system as well as the organic equivalency arrangement agreed between the relevant foreign country and Japan?

(Q2-5) In case the organic *Natto* (fermented soybeans) product packaged with packets of *tare* sauce and *karashi* mustard is to be sold, is such *Natto* product (consisting of Natto by itself, and packets of sauce and mustard) considered as organic processed food?

(Q2-6) Whereas the production process managers of organic plants and organic feeds are now able to carry out "re-packing" in accordance with the revised "Technical Criteria for Certifying Domestic or Overseas Production Process Managers of Organic Plants and Organic Feeds (revised in Mar. 29, 2018), isn't it possible for the production process managers of organic processed foods to carry out re-packing of organic processed foods as well, even though the Technical Criteria for them has not been amended?

## 3. Domestic or Overseas Production Process Managers of Organic Livestock

(Q3-1) What are the requirements for becoming a certified production process manager of organic livestock products?

(Q3-2) How can livestock operators affix grading labels to their products?

## II Re-packers

(Q4-1) What kind of business operators are included in the scope of certified Re-packers of organic products?

(Q4-2) ) If we are to carry out repacking of organic processed foods at the backyard of a supermarket, should we become certified Re-packer?

(Q4-3) In case we purchase organic JAS certified brown rice (to which Organic JAS seal is attached) and sell polished white rice in repacked packaging or mixed organic rice packaging with Organic JAS logos, should we become organic JAS certified Production Process Manager or organic JAS certified Re-packer?

(Q4-4) With reference to the technical criteria for certifying Re-packers, is it possible for the same person to act concurrently as a "Re-packer" and a "person in charge of grading label"?

(Q4-5) Is it permissible for the retailers, that have not obtained re-packer certification, to engage in those activities such as removal of wilted portions of organic spinach?

(Q4-6) If we are to repack the alcohol beverage products and reapply Organic JAS seals to the relevant organic products at the liquor stores (in the case of rebottling, tasting or "*Kakuuchi*" (paid tasting)), is it necessary

for us to obtain Organic JAS Certification for Re-packers of organic processed foods?

(Q4-7) In the cases where a re-packer owns multiple re-packing facilities, should such re-packer obtain certification for each facility?

(Q4-8) Whereas the provision-7.1 of Technical Criteria for certifying Re-packers stipulates that “the grade-labeling department must be independent from the operational units substantially, having independent authority”, however, in the cases where the grade-labeling staff may have to carry out operational activities as well due to the staff shortage, what should we do?

### **III Importers**

(Q5-1) Is it permissible for the importers or re-packers to delegate some of their tasks, such as storage, re-packing, or grade labeling etc. for the imported plant products or re-packing plant products, to the warehouse companies?

(Q5-2) What packaging activities are the certified importers allowed to perform within the scope of their certification?

(Q5-3) In case the importers import plants or processed foods of plant origin labeled as “organic” in a foreign language and put them on the market without attaching any organic labels written in Japanese, is it necessary for such importers to be certified?

(Q5-4) In case we import organic products produced in country B (in accordance with the organic system of country A) via country A, under our organic equivalency arrangement with country A, as organic equivalency arrangement is not available with country B, is it possible for us to attach Organic JAS logos to the products based on the certificate issued by country A?

(Q5-5) In case we import organic foods graded in Country A via Country B and affix Organic JAS seals to the imported foods, whereas our organic equivalency arrangements are established with both countries A and B, which country’s certificate shall be required for us?

(Q5-6) In case we import certified organic foods from our organic equivalent countries and use them as ingredients for our organic processed foods, is it possible for our importers to take delivery of the laden import container direct to our factories without being kept in storage at the warehouse and attach organic JAS logos to such imported foods at their factories?

(Q5-7) Regarding the provision 7.2.1 – f) of the Technical Criteria for Certifying Importers of Organic Plants and Organic Processed Foods of Plant Origin, which stipulates that part of the certified importers’ tasks may be consigned to the certified operators of the organic equivalent countries, what kind of services does this (“the part of the tasks”) mean specifically?

(Q5-8) In what cases certified operators in the organic equivalent countries, under the sub-contract agreement with the certified importers, may be able to attach Organic JAS logos to specified agricultural and forestry products before exporting them to Japan?

(Q5-9) In the cases where certified importers may consign labelling activities (attaching Organic JAS seals to the products) to the certified operators in the organic equivalent countries, what about the details of such sub-contract agreement or consignment agreement?

(Q5-10) In the cases where certified importers may consign labelling activities (attaching Organic JAS logos to the products) to the certified operators in the organic equivalent countries, is it necessary for the overseas operators to pay any fees to the certified importers?

(Q5-11) With reference to 7.2.1 – f) of the Technical Criteria for Certifying Importers of Organic Plants and

Organic Processed Foods of Plant Origin, which is provided in the “Grading label rules” in case the certified importers consign labelling activities (attaching Organic JAS logos to the products) to the overseas certified operators, what does this (“Matters concerning the supervising”) mean specifically? Would you be more specific?

(Q5-12) In the cases where certified importers may consign labelling activities (attaching Organic JAS logos to the products) to the certified operators in the organic equivalency countries, what kind of training programs shall be required for the grade labelling staff assistant working for outsourced contractor?

(Q5-13) With reference to the Article 12-(2) of Act on Japanese Agriculture Standards, may we understand that such certification bodies “recognized as equivalent to the foreign governmental organizations (by MAFF)” are able to issue certificates (for the products exported to Japan) only to the certified operators in their own countries?

(Q5-14) In the cases where an importer in Japan is to import the organic JAS certified products affixed with the organic JAS logos by the relevant overseas certified operator, does such importer need to get certified?

#### **IV Japanese Agricultural Standards**

(Q6-1) Please explain the details of the organic labelling regulations.

(Q6-2) What kind of substances are allowed for use under the organic JAS?

(Q6-3) With reference to the Article 12-(2) of Act on JAS, which specifies as “those that have an equivalent grading system.....”, how do you determine and publicize such equivalent countries?

(Q6-4) As “issuance of export certificates” shall be included in the certification operations of accredited certification bodies from April 1<sup>st</sup>, 2022, (as specified in the Article 46 of the Regulation for Enforcement of the Act on JAS), what actions should certification bodies take specifically?

(Q6-5) Regarding the amendment to the Act on JAS in 2022, what is the reason why the certification should be required for the foreign grade labeling?

(Q6-6) Please explain what foreign grade labeling means.

(Q6-7) In what circumstances, should the foreign grade labeling operators obtain certification?

Please also clarify:

- 1) Isn't it necessary for the operators who export their products under the organic equivalency arrangement to obtain certification for the foreign grade labeling operators, if they don't affix foreign grade certification labels (based on the relevant foreign grade certification system) to their products?
- 2) Is it necessary to obtain such certification for the foreign grade labeling operators even in the cases where the foreign grade labels are not affixed to the relevant agricultural and forestry products or their packages/containers but are affixed only to their invoices?

(Q6-8) In the cases where the certified organic production process managers are to obtain the certification for the foreign grade labeling operators and affix the relevant foreign grade labels to their own agricultural and forestry products (produced by their in-house manufacturing), is it possible for the relevant production process managers to skip the process of affixing JAS seals?

(Q6-9) In the cases where the certified organic production process managers are to obtain the certification for the foreign grade labeling operators and affix the relevant foreign grade labels to their own agricultural and forestry products (produced by their in-house manufacturing), do the relevant production process managers have to affix JAS seals to their agricultural and forestry products before affixing the foreign grade labels?

(Q6-10) In the cases where the trading companies etc. are to purchase the organic certified products attached with JAS seals from the certified production process managers, affix the foreign grade labels to the invoices of the relevant products and export the relevant products to the organic equivalency countries, is it possible for the

relevant trading companies etc. to export the relevant products direct from the place where the relevant production process managers are located, without going through any other receiving and storage facilities?

(Q6-11) In the cases where the operators are to export their organic products of plant origin under the organic equivalency arrangement, does the relevant operator have to attach the export certificate to their products, even if they are certified as foreign grade labeling operators?

(Q6-12) Is it possible for the certified foreign grade labeling operators to distribute the foreign grade labeled products in Japan?

(Q6-13) Should the certified importers remove/delete the foreign grade labels (affixed by the certified operators under the equivalency countries' grading system) after importing such products to Japan?

(Q6-14) In the cases where the certified importers entrust the duty of affixing JAS seals to the certified operators under the equivalency countries' grading system, is it possible to import such products attached with both JAS seals and foreign grade labels?

(Q6-15) Is it possible for the certified importers to affix "such labels displaying both foreign grade logos and organic JAS seals side by side (which are confirmed by the certification bodies under the equivalency countries' organic grading system)" to the relevant agricultural and forestry products in Japan for the distribution in Japan?

(Q6-16) Even in the cases where there's a possibility that the same products could be exported under the equivalency or distributed in the Japanese domestic market, isn't it possible to affix such joint labels as displaying both foreign grade and JAS logos to the same products and distribute them in the Japanese domestic market?

### **1. JAS for Organic Plants (regarding Clause-3)**

(Q7-1) Regarding the "other substances applied to soil, plants or mushrooms" specified in 3.4 (Prohibited Substances) of JAS for Organic Plants, what exactly are those substances?

(Q7-2) Does this standard apply to those plant products that are grown hydroponically or grown in rockwool cubes or small pots?

(Q7-3) Does this standard apply to *Wasabi* cultivated in flat gravel beds?

(Q7-4) It seems that the JAS for Organic Products of Plant Origin may not apply to manufactured or processed plant products. We wonder how you define the activities associated with manufacturing or processing in the production process. Would polishing rice be included in the definition of processing?

(Q7-5) In case a farmer processes self-produced organic plants and sells the processed products as organic processed foods, is it necessary for such farmer to obtain the certificate for production process manager of organic processed foods as well, in addition to the certificate for production process manager of the organic plants?

(Q7-6) In the cases where green tea leaves may be graded as crude green tea by the production process managers of organic plants or rice bran may be labelled as organic by the production process managers or re-packers of organic products of plant origin, is it necessary for such production process managers or re-packers to obtain the certification for the organic processed foods as well?

### **(With reference to Clause 4)**

(Q8-1) Regarding the "natural cyclical function of agriculture" specified in 4 – a) of JAS for Organic Products of Plant Origin, what does this mean?

(Q8-2) Please explain why fungi are included in the JAS for Organic Products of Plant Origin?

(Q8-3) With reference to 3.8 (Collecting/harvesting area) of JAS for Organic Products of Plant Origin, please let us know what kind of plants are collected/harvested in collection areas.

(Q8-4) With reference to 3.8 (Collecting/harvesting area) of JAS for Organic Products of Plant Origin, why wild plants or naturally grown plants should be included here?

(Q8-5) With reference to the “sprouts” specified in 4 – a) of JAS for Organic Products of Plant Origin, for which the production methods criteria have been newly provided by the amendment to this standard in December, 2015, what kind of plants are included in this category.

**(Related to Clause 5 “Fields, Cultivation sites”)**

(Q9-1) With reference to the requirements for the fields, at what point in time should such organic management be deemed to have started?

(Q9-2) Regarding “the newly developed fields or fields which have not been used for cultivation”, at what point in time should such plants production be deemed to have started?

(Q9-3) Is it possible to repeat the organic farming and conventional farming alternately in the same fields?

(Q9-4) With reference to the provision 5.11 of JAS for Organic Products of Plant Origin, which stipulates that “... must be those fields, where the necessary measures have been taken to prevent the drift or runoff of prohibited substances from surrounding areas into the fields”, how should we make such decisions specifically?

(Q9-5) How should we deal with the designated areas for aerial pesticide application?

(Q9-6) How can you verify the effectiveness of such measures to prevent pesticide spray drift from the designated areas for aerial pesticide application?

(Q9-7) With reference to 5.2.1, which specifies “necessary measures to prevent the prohibited substances from drifting and flowing from surrounding area”, or especially “the measures to prevent the prohibited substances from drifting or flowing into the irrigation channels”, what does this mean specifically? Would you be more specific?

(Q9-8) With reference to the “plant products harvested from perennial plants” specified in 5.1.2 – a), what kinds of crops are those specifically? Would you be more specific?

(Q9-9) Regarding the provision 5.1.2 – a), which stipulates that “in case of newly developed fields or fields which have not been used for cultivation, and in which prohibited substances have not been used for no less than two years”, please let us know why such conversion period should be reduced in such case.

(Q9-10) How should we handle the crops produced from the organic farming fields that are affected by the pesticide drift from other agricultural fields where agricultural chemicals are applied?

**(Related to Clause 5 “Seeds or seedlings to be used in fields”)**

(Q10-1) Regarding the “budwood, rootstock...” specified in 3.9, what does this mean specifically? Would you be more specific?

(Q10-2) With reference to 3.9 of JAS for Organic Products of Plant Origin, which stipulates that “Part of or all of plant body...”, what does “part of” mean specifically? Would you be more specific?

(Q10-3) With reference to 5.4.3 of JAS for Organic Products of Plant Origin, which stipulates that “...it is permissible to use seeds for seed-propagating varieties and youngest seedlings etc. for nutrient-propagating varieties...”, what kind of plants are included in such species? What does the “youngest available seedlings” mean? Would you be more specific?

(Q10-4) What do “edible sprouts” mean? Would you be more specific?

(Q10-5) Please let us know what kind of seeds or seedlings we may use in the fields.

(Q10-6) With reference to 5.4.3 of JAS for Organic Products of Plant Origin, which stipulates that “In the cases where it is difficult to obtain .....”, what kind of situation does this mean specifically?

(Q10-7) With reference to 5.4.2 of JAS for Organic Products of Plant Origin, which stipulates that “in the cases where there’s a necessity to maintain/renew the varieties”, what kind of situation does this mean specifically?

(Q10-8) Regarding the organic seedlings available for sale in the market, how shall we verify whether they conform to the criteria specified in 5.4.1 of 5.4 (“Seeds or seedlings to be used in fields”) of JAS for Organic Products of Plant Origin?

(Q10-9) Regarding the agricultural materials, with which seeds may be encapsulated in a strip-shape, as specified in 5.4 of JAS for Organic Products of Plant Origin, please explain why such materials should be limited to those derived from cotton linter. Could any sheet-shaped materials be used rather than strip-shaped materials?

(Q10-10) Is it permissible to use improved plant varieties produced by irradiation or seeds of such varieties derived therefrom under the JAS for Organic Products of Plant Origin?

#### **(Related to Clause 5 “Manuring practice in fields”)**

(Q11-1) What does “the method effectively utilizing biological functions” mean?

(Q11 – 2) Please explain the situations of “cases where the productivity of fields derived from soil are not maintained or increased only by methods utilizing biological functions”

(Q11-3) For the purpose of managing the manuring practices in the fields, in cases where microorganisms may be introduced from the outside or microorganisms are cultivated for the preparation of the “Fertilizers and soil improvement substances” provided in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, is it possible to use the following culture medium or growth medium?

- a) Those to which chemical synthetic substances have been added in the process of manufacturing
- b) Those for which genetic recombination technology is used

(Q11-4) In cases where we can obtain only those seeds that have been sterilized by the substances other than those listed in the Annex B-Table-B.1 of JAS for Organic Products of Plant Origin, is it possible to use such seeds in the organic fields as Green Manure Seeds?

#### **(Related to Clause 5 “Fungus spawn”, “Cultivation sites”, “Cultivation management in cultivation sites”)**

(Q12-1) What kind of seed fungi are allowed for use?

(Q12-2) With reference to “Sugar” specified as cultivation substance in 5.5.1-d)-3) of JAS for Organic Products of Plant Origin, is it possible to use any sugar for this cultivation purpose, that has gone through the refining process where such foods additives other than those specified in Annex A-Table A.1 and Annex B-Table B.1 of JAS for Organic Processed Foods have been used?



(Q12-3) What kind of soil is allowed for use as cover soil in the mushroom cultivation on compost?

(Q12-4) What kind of materials are allowed for use in the compost-based cultivation of mushrooms?

(Q12-5) With reference to 5.8.1 b)- 1) (Plant products), 2) (Processed foods) and 3) (Feeds), of 5.8 (Cultivation management at the Mushrooms cultivation site) of JAS for Organic Products of Plant Origin, are all those substances or materials not allowed for use, unless they are organic JAS certified and labelled with organic JAS seals (for grading)?

(Q12-6) With reference to 5.8.2 and 5.8.3 of 5.8 (Cultivation management at the Mushrooms cultivation site) of JAS for Organic Products of Plant Origin, which stipulate that “If it’s difficult to obtain substances specified in 5.8.1 a)~c), what does this mean?

(Q12-7) Is it possible to use Styrofoam plugs as fungal plugs after inoculation in the mushroom cultivation on the logs?

(Q12-8) What kind of water should we use for growing sprouts without soil?

(Q12-9) Is it possible to clean and disinfect the facilities and equipment that are used for growing sprouts without soil?

(Q12-10) What type of lighting should we use in the cultivation facilities for growing sprouts without soil?

**(Related to Clause 5 “Control of noxious animals and plants in fields or cultivation sites”)**

(Q13-1) What are those three types of control methods specified in 3.12 (cultural control), 3.13 (physical control) and 3.14 (physical control) of JAS for Organic Products of Plant Origin? Please explain.

(Q13-2) With reference to “Cultural Control” specified in 3.12 of JAS for Organic Products of Plant Origin, what does “selection of crops and varieties” mean?

(Q13-3) With reference to “Cultural Control” specified in 3.12 of JAS for Organic Products of Plant Origin, what does “adjustment of planting season” mean?

(Q13-4) Is it permissible to apply rice bran, broken soybeans, soy pulp etc. to the paddy field to control weeds?

(Q13-5) ) Is it permissible to apply weakened noxious animals and plants (weakened by using agricultural chemicals specified in the Annex B-Table B.1 of JAS for Organic Products of Plant Origin) to the fields, for the purpose of introducing the predatory animals and microparasites?

(Q13-6) With reference to 5.10.2 of JAS for Organic Products of Plant Origin, which stipulates that “... due to the imminent risk of significant damage to plant products...”, what kind of situation does this mean?

(Q13-7) What kinds of mulches are allowed for use?

**(Related to Clause 5 (General Management, Seedling Management)**

(Q14-1) Please explain why these two clauses (5.11 (General management) and 5.12 (Seedling management) were newly added to Clause 5 (Production Methods) of JAS for Organic Products of Plant Origin in the 2005 revision?

(Q14-2) Is it permissible to use those substances specified in the Annex B-Table B.1 of JAS for Organic Products

of Plant Origin, for the disinfection of the seeds (purchased or home-grown) produced in accordance with Clause 5 (of JAS for Organic Products of Plant Origin)?

(Q14-3) Is it permissible to use salt water for seed selection according to specific gravity?

(Q14-4) Is it permissible to use seawater in the fields?

(Q14-5) Does the “field” (specified in 5.1 of JAS for Organic Products of Plant Origin) include the places for raising seedlings (such as nursery boxes or nursery beds)?

(Q14-6) If the seedlings were raised by using the soil obtained from a field in transition/conversion to the organic farming and transplanted into the same fields in transition/conversion (where the soils for raising seedlings were collected), would such soil be considered as those specified in 5.12.1 of 5.12 (“Seedling Management”) of JAS for Organic Products of Plant Origin?

(Q14-7) In case the seedlings are raised in non-organic fields, should such raising area be kept free from the prohibited substances for more than two years prior to raising seedlings?

**Related to Clause 5 (Management concerning Harvest, Transportation, Selection, Processing, Cleaning, Storage, Packaging, Other Post-harvest Processes)**

(Q15-1) Would the management standards specified in 5.13 (“Management for Harvesting, Transportation, Selection, Preparation, Washing, Storage, Packaging, and Other Post-harvest Processes”) of JAS for Organic Products of Plant Origin, be construed as “the management criteria for the processes carried out before the products are delivered to the customers”?

(Q15-2) What kinds of materials or substances should be used for cleaning the machines or tools involved in the processes specified in 5.13 (“Management for Harvesting, Transportation, Selection, Preparation, Washing, Storage, Packaging, and Other Post-harvest Processes”) of JAS for Organic Products of Plant Origin?

(Q15-3) With reference to 5.3.6 of JAS for Organic Processed Foods, which stipulates that “... such chemical agents other than those specified in Annex C-Table C.1 may be used”, is it likewise possible to use any chemicals other than those listed in the Annex C-Table C.1 at the facilities for the preparation etc. of the organic plants?

(Q15-4) With reference to 5.13.3 of JAS for Organic Products of Plant Origin, which specifies that “however, in the case the substances specified in Table B.1 and Table C.1 are used, comingling of such substances with the plant products must be avoided”, could the plant products be contaminated with such substances in the cases where Carbon dioxide fumigant or Diatomaceous earth powder are used?

(Q15-5) With reference to 5.13.3 – b) of JAS for Organic Products of Plant Origin, which stipulates that “For maintenance and improvement of the quality...”, what does this mean? Please clarify.

(Q15-6) Whereas the “ionizing radiation” is not allowed for use, as specified in 5.13.4 of JAS for Organic Products of Plant Origin, is it permissible to use ionizing radiation in the process control?

(Q15-7) For the purpose of protecting workers from insect bites, etc., is it permissible to use insect repellent in the fields and work areas?

(Q15-8) Whereas we understand that phytosanitary measures shall be applied to the wood packaging materials for imported goods, how would the organic plants be handled under such measures?

(Q15-9) Aren’t there any chemical residues left in the organic plant products?

**(Related to Annex A-Table A.1 “Fertilizers and soil improvement substances”)**

(Q16-1) What criteria are used to determine those substances listed in the Annex A-Table A.1?

(Q16-2) What about the criteria for the substances allowed for use in organic plants production under the unavoidable circumstances?

(Q16-3) Is it permissible to use suchcompost derived from genetically modified crops?

(Q16-4) Whereas the criteria for the organic byproducts derived from food industries etc. specified in the Annex A – Table A.1 (“Fertilizers and soil improved substances”) was revised in 2005, isn’t it permissible to use those organic byproducts derived from food industries, that were allowed for use in the past?

(Q16-5) Whereas those substances ranging from fish meal powder to steamed bone, that had been specified in Annex A-Table A.1 of the JAS for Organic Products of Plant Origin, were deleted by the 2005 amendment, are those substances not permitted for use in the organic crop production any longer?

(Q16-6) With reference to the criteria of “plant and wood ash”, which is specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin as “Natural substances or substances derived from natural sources, that have not undergone any chemical treatment”, is it necessary to verify whether any chemical substances were used at the production stage of the original plants?

(Q16-7) In the cases where an ion exchange membrane is used at the refining processes of “potassium chloride or sodium chloride”, is it permissible to use processing aids such as hydrochloric acid, etc.?

(Q16-8) Whereas “fossil shell fertilizers” were deleted from the Fertilizers and soil improvement substances specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, are those substances not permitted for use any longer?

(Q16-9) With reference to “trace elements” specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, please explain what kind of substances they are. Is it permissible to use synthetic trace elements as well?

(Q16-10) With reference to the criteria of “Stone meal”, which is specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin as “not contaminating the soil with harmful heavy metals or other harmful substances included in sources”, in what situations should such criteria apply?

(Q16-11) With reference to “By-products of the sugar industries” specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, what kind of products are they? Whereas the sugar refining industry generally involves a chemical treatment process, is it permissible to use such byproducts generated from such manufacturing processes?

(Q16-12) With reference to “other fertilizers and soil improvement substances” specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, what kinds of substances are allowed for use?

(Q16-13) With reference to “other fertilizers and soil improvement substances” specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, what about the criteria for determining whether the productivity of the agricultural land derived from the nature of the soil can be maintained and improved by using other substances in this Table A.1”?

(Q16-14) Is it permissible to use sewage sludge in the organic plants production?

(Q16-15) Is it permissible to use human-feces-based fertilizers?

**(Related to the Annex B-Table B.1 “Agricultural Chemicals”)**

(Q17-1) What about the criteria for the selection of those substances listed in Annex B-Table B.1?

(Q17-2) With reference to “Biological pesticides such as natural enemies” specified in Annex B-Table B.1 of JAS for Organic Products of Plant Origin, what kind of substances would fall into this category?

**(Related to the Annex C-Table C.1 “Chemical agents”)**

(Q18-1) How should we carry out pest control or small animal control in the storage warehouses for the organic plant products?

(Q18-2) With reference to the Criteria of Annex C-Table C.1 (Chemical agents) of JAS for Organic Products of Plant Origin, which stipulates that “Excluding the cases where it is used in the plant products production for the purpose of controlling pests and diseases”, what does this mean?

(Q18-3) What kind of chemical agents can be used as attractants or repellents for noxious animals and plants in the harvest and post-harvest processes?

**(Related to the Annex D-Table D.1 “Substances for Preparation etc.”)**

(Q19-1) Are there any specific requirements applicable to the “Hypochlorous acid water (allowed for preparation use etc.)”, that is specified in Annex D-Table D.1 of JAS for Organic Products of Plant Origin?

**(Related to the Supplementary Clause)**

(Q20-1) Is it possible to use any substances or materials to adjust the viscosity of the soil for growing seedlings?

**2. JAS for Organic Processed Foods (Related to Clauses 4)**

(Q21-1) Why should processing methods be limited to those utilizing physical or biological functions?

(Q21-2) What exactly are those processing methods utilizing physical and biological functions?

**(Related to Clauses 3 & 4)**

(Q22-1) Regarding the definition of Organic Processed Foods, which was revised in 2006, please let us know the details of such revised definition.

(Q22-2) In cases where organic processed foods are used as ingredients in the production of finished organic processed food products, what should be taken into consideration?

(Q22-3) With reference to 5.1 of JAS for Organic Processed Foods, which stipulates that “If it’s difficult to obtain organic plants, organic livestock products, organic algae or organic processed foods, anything other than those.....may be used”, what is the reason for this?

(Q22-4) Regarding those alcohol beverages, that are labeled as organic (organic processed alcohol beverages of plant and livestock origin) in accordance with the Labeling Standard for Organic Materials in Alcoholic Beverage (NTA notice #7 in 2000) but not affixed with organic JAS seals, is it possible to use them as ingredients for the organic processed foods?

Besides,

- 1) Even during the transitional period before the entry into force of amended Act (to be amended to include

Alcohol Beverages in the scope of Designated Agricultural and Forestry Products), isn't it permissible to use such organic processed alcohol beverages of plant and livestock origin as ingredients for organic processed foods?

2) Isn't it permissible to use those organic processed alcohol beverages of plant and livestock origin as ingredients for the organic processed foods, even if they were imported from the organic equivalency countries or regions?

(Q22-5) Whereas the ingredients are limited to those labeled with Organic JAS seals, what about those organic plant products or organic processed foods that have been graded using a grading system of a country recognized to have a grading system equivalent to the Organic JAS system but do not carry Organic JAS seals? Is it permissible to use those products as ingredients by obtaining a relevant certificate?

(Q22-6) Regarding the "Ingredients and additives (including processing aids)" specified in 5.1 of JAS for Organic Processed Foods, why should processing aids be included in additives?

(Q22-7) With reference to the exceptional clause specified in 5.1 a) of 5. (Production Methods) of the JAS for Organic Processed Foods, does this mean duplicated grading or grading twice?

(Q22-8) Is it permissible to use lactic acid bacterium as ingredients under JAS for Organic Processed Foods?

(Q22-9) With reference to 5.1 (Ingredients and additives (including processing aids)) of JAS for Organic Processed Foods, which stipulates that "Organic products of plant/livestock origin and processed foods, that are in the same category as those products (organic plant products, organic livestock products, organic algae, and organic processed foods) used as ingredients", how can you determine specifically which product falls into which category?

For example,

"*Kurome daizu*" (dark hilum soybeans) and "*Shirome daizu*" (white hilum soybeans),

Cabernet Sauvignon and Muscat Bailey A

Green soybeans and Soybeans, Non-glutinous rice and Glutinous rice, Tomato ketchup and Tomato puree,

"Sencha" (Green tea of middle grade) and "Matcha" (powered green tea), "*Koikuchi shoyu*" (dark soy sauce) and

"*Usukuchishoyu*" (light soy sauce)

(Q22-10) With reference to "Those products produced by recombinant DNA technology" specified in 5.1 - b)-3) of JAS for Organic Processed Foods, what does this mean specifically?

(Q22-11) Regarding the "Ionizing radiated foods" specified in 5.1 - b)-2) of JAS for Organic Processed Foods, how can we verify whether the foods have been treated with ionizing radiation?

(Q22-12) Is it permissible to use any substances other than those specified in Annex A-Table A.1 or Annex B-Table B.1 of JAS for Organic Processed Foods, in the production of Food & Beverage (excluding organic plant products, organic livestock products, organic algae, and organic processed foods), Oils & Fats, and Salt?

(Q22-13) Is it permissible to use refined salt mixed with seawater bittern, as salt in the processing of organic processed foods?

(Q22-14) Whereas the Non-organic percentage of the total ingredients should be no more than 5 percent, should such percentage be calculated based on the total raw materials or based on the finished products?

(Q22-15) Is it permissible to use any ingredients produced by recombinant DNA technology for the processed foods other than organic processed foods (which can be used as ingredients (no more than 5% of the total) for organic processed foods)?

(Q22-16) In the cases where we use the biological function for the organic processed foods production, is it permissible to use the microorganisms cultured with the following materials?

- Any ingredients other than those organic products (organic plant products, organic livestock products, organic algae, and organic processed foods)

- Any materials modified by recombinant DNA technology

(Q22-17) Explain why those organic foods containing 70% or more and less than 95% organic ingredients are not recognized under JAS for Organic Processed Foods.

(Q22-18) Whereas the ionizing radiation is not allowed for use for the purpose of controlling noxious animals and plants as well as saving or sanitizing foods, would it be allowed for use for the purpose of process management?

(Q22-19) Is it permissible to use synthetic disinfectants or detergents for the purpose of cleansing plant products used as ingredients for the organic processed foods?

(Q22-20) What kind of water can be used as ingredients for the organic processed foods?  
Would any disinfectants such as sodium hypochlorite be allowed for use for making well water drinkable?

(Q22-21) Is it permissible to clean and disinfect the machines and equipment used in the processing process?

(Q22-22) Is it permissible for the production process managers to add deoxidants to the package of the products?

(Q22-23) Whereas it was not permissible to use salt as ingredients for organic alcohol beverages, in accordance with the Labeling Standard for Organic Materials in Alcoholic Beverage (NTA notice #7 in 2000), is it permissible to use salt as ingredients for organic alcohol beverages under the organic JAS for processed foods?

(Q22-24) In case distilled alcohol is used as an ingredient for organic alcohol beverages, is it permissible to use those that are not bearing organic JAS seals?

(Q22-25) Oak chips used in the production of alcohol beverages, for example, is it permissible to use such raw materials, that shall be removed later, in the production of organic processed foods?

If it's permissible, please let us know how we can calculate composition, even though they are not contained in the final products.

#### **(Related to the Annex Tables)**

(Q23-1) Is it permissible to use any substances obtained by recombinant DNA technology as raw materials in the production of food additives?

(Q23-2) Is it permissible to use calcinated calcium, which is included in the existing additives, in the processing of the organic processed foods?

(Q23-3) Is it permissible for the certified re-packers or certified importers to carry out nitrogen injection in the tea packaging process?

(Q23-4) Why was the list of chemicals specified in Annex C-Table C.1 of JAS for Organic Processed Foods revised completely?

(Q23-5) Whereas Potassium Pyrosulfite (including Potassium Hydrogen Sulfite Solution) is listed in Annex B-Table B.1 of JAS for Organic Processed Foods, is it permissible to use Potassium metabisulfite or potassium bisulfite (instead of Potassium Pyrosulfite)?

(Q23-6) In the cases where we produce organic processed foods other than organic alcohol beverages, by using in-house alcohol beverage products as its ingredients, is it permissible to use those additives that are listed in Annex A-Table A.1 of JAS for Organic Processed Foods but not in Annex B-Table B.1 of JAS for Organic Processed Foods, in the production of such organic beverages?

(Q23-7) Is it permissible to use those additives listed in Annex B-Table B.1 of JAS for organic processed foods in the production of organic *Sake Lees*?

(Q23-8) In the cases where the *Sake* breweries (that are certified for production process managers of organic processed foods) are to produce/grade the refined *Sake* containing seed vinegar (as raw material for the edible vinegar), that have been made unsuitable for drinking, at the request of the edible vinegar producer, is it permissible to use those additives listed in Annex B-Table B.1 of JAS for Organic Processed Foods?

### **3. JAS for Organic Livestock etc. (Related to Clause 3)**

(Q24-1) Whereas the species of domestic animals and poultry are limited to only those specified in 3.2 and 3.3 of JAS for Organic Livestock Products, isn't it possible to grade those livestock products derived from any other species?

(Q24-2) What kind of items are included in this Standard?

(Q24-3) In the cases where we carry out "in-house feeds production or blending for organic livestock", is it necessary to obtain a certification for a production process manager of "organic feeds?"

(Q24-4) Regarding the "Livestock replenishment" specified in 3.1.5 of JAS for Organic Livestock Products, which stipulates that "no more than 1/3 of the domestic animals shipped or deceased in the last 3 business years", what about the cases where less than three years have elapsed since the start of organic breeding?

(Q24-5) Regarding the "Average amount of feed intake" specified in the Annex C-Table C.1 of JAS for Organic Livestock Products, how these figures are calculated?

(Q24-6) Are those crops such as turnip, beet, bamboo, etc. included in the scope of the roughages specified in 3.2 of JAS for Organic Livestock Products?

### **(Related to Clause 4)**

(Q25-1) Regarding the Clause 4, which stipulates that, "... based on the principle of avoiding the use of veterinary drugs ...", what does this mean specifically?

### **(Related to Clause 5.1 "Housing for domestic animals or poultry")**

(Q26-1) Regarding the provision 5.1.1 -a) of JAS for Organic Livestock Products, which stipulates that "Livestock are allowed free access to feeds and fresh water", what specific measures are necessary?

(Q26-2) Are there any specific standards or guidelines available for "fresh water?"

(Q26-3) Regarding the provision 5.1.1 -b) of JAS for Organic Livestock Products, which stipulates that "it has a sturdy structure that maintains appropriate temperature, humidity, ventilation, air flow and brightness from sunlight", is there any specific numerical criteria available? Are there any requirements such as window sizes, etc.?

(Q26-4) Is it permissible to use recycled compost as bedding in the livestock or poultry houses?  
Regarding the provision 5.1.1 -g) of JAS for Organic Livestock Products, which stipulates that "it must have a clean and dry earth floor", what kind of situation does this mean specifically?

(Q26-5) Whereas the pasture breeding in the open-air grazing area throughout the year is the basic management practice for livestock, should such minimum area of Housing (specified in Annex E-Table E.1 of JAS for Organic Livestock Products) be satisfied as well?

(Q26-6) Is it permissible to raise poultry in the battery cages?

(Q26-7) Is it permissible to breed livestock or poultry basically in the outdoor breeding area without providing livestock or poultry housing but a small shed as a night shelter (a small shed which is not used for breeding and in which animals and poultry are to be locked up at night for protection from predators)?

**(Related to Clause 5.2 “Open-air free runs”)**

(Q27-1) With reference to 5.2.1 -c) of JAS for Organic Livestock Products, which stipulates that “It must have standing trees, woods, or facilities that provide shelter from excessive rain, wind, sunlight and temperature, in case livestock or poultry are not allowed free access to the livestock or poultry housings”, do we have to provide such facilities, in case we temporarily prevent grazing animals from the free access to the housings for the purpose of cleaning or feeds preparation?

(Q27-2) With reference to the “fields for growing perennial plants (other than pasture grasses)” specified in 5.2.1 -f) -1) of JAS for Organic Livestock Products, please clarify what situation is assumed here.

(Q27-3) With reference to the provision 5.2.1 -h) of JAS for Organic Livestock Products, which stipulates that “in the case of open-air runs for livestock or poultry specified in Annex F-Table F.1, it must have an area equal to or greater than the area specified in Table F.1 for each livestock or poultry”, does such number of livestock or poultry include only those that have free access to the open-air runs?

(Q27-4) In the case of “breeding sites that are covered by a roof and surrounded by wire fences to protect from the predators”, would such breeding sites be recognized as “open-air free runs”?

(Q27-5) What would happen if we mistakenly used prohibited materials and/or genetically modified seeds and seedlings in the open-air free runs?

(Q27-6) If we started cattle (excluding pigs) grazing in the newly cultivated fields or those not used for the agricultural purpose, where prohibited substances have not been used for 2 years or more, is it possible to reduce the duration specified in 5.2.1 -f) of 5.2 (Open-air runs) of JAS for Organic Livestock Products?

**(Related to Clause 5.3 “Domestic animals or poultry”)**

(Q28-1) In the cases where mother heifers had been treated with hormone at breeding and raised in the organic holding for 6 months or more after being converted to organic, would the calves born to such heifers considered to fall into the organic livestock category?

(Q28-2) With reference to 5.3.2 of JAS for Organic Livestock Products, which stipulates that “The poultry shall be raised organically after hatching”, is it permissible to use incubator to hatch eggs rather than the natural incubation by the parent birds?

(Q28-3) With reference to Annex G-Table G.1 (Conversion periods) of Organic Livestock Products, which stipulates that “From the third day after hatching to slaughter” specified in the Item “Meat-type poultry other than ostrich”, do you count the day of hatching as the “Day 0” or “Day 1”?

(Q28-4) With reference to Annex I-Table I.1 (Requirements for external introduction) of JAS for Organic Livestock Products, which stipulates that “Less than 3 days of age” specified in the Item “Meat-type poultry”, does this mean the same as “less than three days after hatching”?

(Q28-5) With reference to Annex I-Table I.1 (Requirements for external introduction) of JAS for Organic Livestock Products, which stipulates that “Less than 18 weeks of age” specified in the Item “Laying hens”, how many days of age does this mean?



**(Related to Clause 5.4 “Feeding”)**

(Q29-1) Is it permissible to use organic feeds produced overseas in the production of organic livestock products?

(Q29-2) In cases where the overseas production process managers produce organic livestock products, do they have to use the graded organic feeds? Even if they used the blended feeds that are processed by overseas production process managers themselves, is the grading still required for the ingredient plants and blended feeds?

(Q29-3) Please tell us what additives are permitted or prohibited for use as feed additives.

(Q29-4) Provided that the provisions specified in the “Act on Safety Assurance and Quality Improvement of Feeds” (Act No. 35 issued in 1953) be satisfied, would any chemically synthesized substances or genetically modified feed additives be allowed for use as ingredients for organic feeds?

(Q29-5) Is it permissible to give to the iron-deficient piglets during the lactation period be permitted?

(Q29-6) With reference to the provision that “feeds other than those specified may be provided up to the ratio specified by the criteria 1)(15%) or 2)(20%) only for a certain period when necessary amount of feeds for organic livestock cannot be provided in case that feeds for organic livestock are difficult to obtain”, which is specified in 5.4.5 of JAS for Organic Livestock Products, whereas the purchased organic feeds may contain 5% or less non-organic ingredients, how should we calculate such figures as 15% or 20% specified in this provision?

(Q29-7) Regarding the percentage calculation (such as “50%”) specified in 5.4.3 of JAS for Organic Livestock Products, based on which unit of measurement (day, month, year, or lifetime) should we calculate such ratio?

(Q29-8) As the provision 5.4.5 of JAS for Organic Livestock Products stipulates that “in the cases where it is difficult to obtain livestock feeds, feeds other than those specified in 5.4.1~5.4.4 may be used only for a period of time until the necessary amount of organic feeds can be used, provided that the utilization ratio be kept under the criteria 1)(15%) or 2)(20%) of the average feed intake”, does this provision (“difficult situations”) apply to the cases where we could not produce feeds by ourselves even though we wish to do so?

**(Related to Clause 5.5 “Health Control”)**

(Q30-1) Is it permissible to put magnets in the cow’s stomach to prevent pericarditis caused by the accidental ingestion of needles or steel wires?

(Q30-2) Would the mastitis ointment for dry or non-lactating periods be allowed for use?

(Q30-3) As the provision 5.5.6 of JAS for Organic Livestock Products stipulates that “Substances for the stimulation of growth and/or production except for feeds shall not be provided”, what kind of substances are not allowed for use?

**(Related to Clause 5 “Criteria for Raising and Production Methods”)**

(Q31-1) As the provision 5.2.1 – d) of JAS for Organic Livestock Products stipulates that “It must have a field etc. in the case of an open-air runs for livestock (excluding porcine livestock),” should such “fields” etc. be covered with vegetation such as grass etc.? Or would straw-bedded exercise area also be acceptable?

(Q31-2) What do you mean by “pasturing”?

(Q31-3) Even in the case where poultry is prevented from the free access to the open-air free runs, could such poultry be recognized as being organically raised, provided that such poultry be pastured in open-air free runs twice or more a week?

(Q31-4) Is it permissible to raise calves in the calf hutches?

(Q31-5) With reference to 5.6.1 of JAS for Organic Livestock Products, which stipulates that “...grazed ... “twice or more a week”, how many hours does it take for each grazing time?

(Q31-6) With reference to 5.6.3 of JAS for Organic Livestock Products, which stipulates that “no one is allowed to intentionally cause physical harm to the livestock or poultry”, what should be taken into consideration to perform such operations specified here?

(Q31-7) Is forced molting permitted?

(Q31-8) With reference to the cleaning agent and disinfectants for milking facility specified in 5.6.8 and Table D.1 of JAS for Organic livestock Products, does this list of substances include all the dairy detergents and disinfectants permitted under the Food Sanitation Act?

(Q31-9) In the cases where seedstock cattle for breeding have not been raised organically, is it permissible to graze such cattle on the organic breeding farms as a stud for breeding?

(Q31-10) ) Is it permissible to use rodenticides?

**(Related to Clause 5.7 “Management concerning slaughter, dressing, selection, processing, cleaning, storage, packaging and other processes” )**

(Q32-1) How can we distinguish organic beef cattle from other types of bovine livestock at the slaughterhouses?

(Q32-2) With reference to 5.7.2 of JAS for Organic Livestock Products, which stipulates that “The slaughter of domestic animals or poultry is undertaken in a manner which minimize stress and suffering by producing loss of consciousness as much as possible”, what kind of efforts are required specifically in order to take such measures?

(Q32-3) Regarding the process of cutting dressed carcasses into meat cuts, is it permissible for the production process managers to obtain a unified certification for the whole production process and carry out this process as well?

(Q32-4) With reference to the organic JAS certified overseas production process managers of organic livestock, isn't it possible for the certified slaughterers to produce and sell organic livestock products if they don't slaughter organic JAS certified livestock or poultry bearing organic JAS seal?

#### **4 . JAS for Organic Feeds**

(Q33-1) Is it permissible for the production process managers of organic plant products to ship rice straw (generated from the organic rice production) as organic feeds?

(Q33-2) In case we are to ship the organic plant products to organic livestock farmers as feeds, since their sizes and shapes do not satisfy the shipment standards even though we produced them to be shipped as organic products, is it permissible for us to grade such products as organic plant products?

(Q33-3) Is it permissible to use any organic feeds produced overseas as ingredients for organic feed production?

(Q33-4) Just like the organic plant products, is it possible to import such organic feeds (that are certified under the relevant foreign country's organic system), affix organic JAS seal to them and sell them as organic?

(Q33-5) Whereas two standards are available for the technical criteria for certifying production process managers of organic feeds (one is “limited to those unprocessed” and the other is “limited to those processed”), which one should be applied to the cases where hay or silage is to be produced? Are we allowed to affix organic JAS seal

and sell them?

(Q33-6) Are there any provisions applicable to prevention of commingling and contamination in transportation and storage of the relevant organic feeds?

## **VI Labelling & Display**

(Q34-1) Is it permissible to display the term “Organic farming practices” on the plant products bearing no organic JAS seal or to display the term “Organic ingredients are used” on the processed foods?

(Q34-2) Is it permissible to label the product as “organic tomatoes with no chemicals”?

(Q34-3) Would such labeling as “organic rice” or “organically cultivated rice” comply with the Food Labeling Standards (Cabinet Office Ordinance No. 10 of March 20, 2015)?

(Q34-4) Is it permissible to display only the product names on the label in order to satisfy the labelling requirements for the organic plant products or organic livestock products?

(Q34-5) Is it permissible to display only the names of the products and ingredients on the label in order to satisfy the labelling requirements for the organic processed foods?

(Q34-6) How should the monitoring for the organic plant products be done?

(Q34-7) Would organic food label regulations apply to the food service industry or Home Meal Replacement (HMR) industry?

(Q34-8) If producers are to sell their plant products (produced in accordance with Japanese Agricultural Standards) directly to the consumers, through collaboration between producer and consumer, should we obtain production process manager certification?

(Q34-9) In case we produce “*natto*” (fermented soybeans) from organic JAS-certified soybeans and sell them under such label as “*natto* (organic-soybean-used)” without Organic JAS logos, is it permissible to display “Organic *Natto*” on the signpost for such sales?

(Q34-10) In case we obtain milk from the cows that are still in the process of conversion to organic farming, is it permissible to label it as “under conversion to organic”?

(Q34-11) In case where organic plant products and “in-conversion organic plant products” were mixed, how should we label them?

(Q34-12) Is it permissible to use a stamp to imprint the organic JAS seals? Or is it permissible for certified operators to use their own personal-computer-generated organic JAS seal images?

(Q34-13) Is it permissible to display such words as “organic XX used” on the labels of fresh produce, without affixing Organic JAS seals to such produce?

(Q34-14) In case where we are to ship processed foods bearing organic JAS seal being packaged in a cardboard box with an indication of “organic XX”, is it necessary to attach Organic JAS seals to the cardboard boxes as well?

(Q34-15) Is it permissible to display such labeling name as “organic rooibos tea” on a free product sample without affixing organic JAS seal to such sample?

(Q34-16) With reference to the certification numbers displayed on the organic JAS seals, in case the accredited

certification bodies put the certification-wise numbers or in case certified operators put the numbers on the organic JAS seals, is there anything we should be aware of?

(Q34-17) Whereas “the Labeling Standard for Organic Materials in Alcohol Beverage (NTA Notice No.7 of 2000)” shall be repealed, how would the 2022 amended Act on JAS be applied to the products that have been labeled as “Organic Alcohol Beverages of plant and livestock origin etc.” so far in accordance with this labeling standard? What about the processed foods which have been produced from such alcohol beverages as their ingredients?

(Q34-18) Whereas we are now considering producing organic alcohol beverages newly, after the 2022 amended Act on JAS came into force, is it possible to label them as “Organic Processed Alcohol Beverages of plant and livestock Origin” etc. in accordance with the transitional measures accompanying the repeal of Labeling Standard for Organic Materials in Alcohol Beverage (NTA Notice No.32 of 2022)?

(Q34-19) In the cases where the organic alcohol beverages are affixed with organic JAS seals and labeled as organic in accordance with JAS for organic processed foods, is it also necessary for us to label them as “Organic Processed Alcohol Beverages of plant and livestock Origin” etc. in accordance with the Labeling Standard for Organic Materials in Alcohol Beverage (NTA Notice No.7 of 2000)?

(Q34-20) In the cases where both representation names are to be displayed on the labels of the alcohol beverages in accordance with both Liquor Tax Act etc. and Food Labeling Act, where should we display the labeling names based on the Clause 6 of JAS for Organic Processed Foods, such as “有機 (Organic)” etc.?

(Q34-21) Whereas the ingredients names are not required to be displayed on the labels in the case of selling alcohol beverages, according to Article 5 of Food Labeling Standards, how should we display the ingredients names based on the Clause 6 of JAS for organic processed foods?

(Q34-22) Whereas our company is importing organic alcohol beverages labeled as organic from overseas, what about the labeling requirements for these organic alcohol beverages?

(Q34-23) With reference to 6.22 of 6.2 (Ingredients shown on the label) of JAS for Organic Processed Foods, in the cases where such “Marks or Signs” are displayed on the labels in place of the description of the ingredients such as “Organic” or “In conversion”, what kind of label display is permitted?

(Q34-24) Regarding the provision specified in 6.1.2, which stipulates that “provided that the common name of the other organic processes foods be the same as the common name of the organic processed foods of plant origin, organic processed foods of livestock origin, and organic processed foods of plant/livestock origin, it’s necessary to clearly describe it”, what’s the reason for that? How should we describe it in order to comply with this provision?

## **VII Others**

(Q35-1) Is it permissible to label the agrochemicals used for organic plants (such as fertilizers or pesticides) as JAS-compliant?

(Q35-2) In case we are to sell organic beef in the supermarket as organic seasoned beef, what kind of certification would be required?

(Q35-3) In the cases where farmers are to process their self-produced organic livestock products and sell them as organic processed foods, what kind of certification would be required?

(Q35-4) In the cases where we are to cut and slice edible meat in the supermarket, is it permissible to use those substances listed in Annex K-Table K.1 of JAS for Organic Livestock Products as disinfectant?

(Q35-5) What is a unified list of substances or materials?

(Q35-6) Regarding the production process manager of the organic products of plant origin or organic feeds, who obtained a group certification for a group of farmers, does the relevant accredited certification body have to conduct an on-site inspection of all the fields and facilities possessed by all the members?

(Q35-7) Regarding the on-site inspection conducted by an accredited certification body for the certified operators (such as product process managers, re-packers, importers) who handle organic products (such as organic plant products, organic livestock products or organic feeds), is it permissible to conduct it remotely regardless of the impact of COVID-19?

(Q35-8) Regarding the organic plant products or organic feeds, that are fumigated as required by the Plant Protection Act,

- 1) Is it possible for the certified importers to import such products under the equivalency arrangement and affix the grade labels to them?
- 2) Is it possible for the certified production process managers of organic feeds or the certified production process managers of organic livestock products to use such fumigated organic feeds (as being graded under the equivalency countries' organic system) as the ingredients for the organic feeds or feeds for the organic livestock products?
- 3) Is it possible for the uncertified importers to import such foreign-grade labeled organic plant products and sell them as it is (being labeled with foreign-grade) etc.?

## **I Production Process Manager**

### **1. Production process manager for organic plants**

**(Q1-1) What kind of activities are to be carried out by the certified production process managers of the organic products of plant origin?**

(A1-1)

Organic JAS Certified Production Process Managers of organic plant products shall manage or take control of the production process of each field, keep such records and be able to affix grading labels (Organic JAS Seals) to the products by conducting the grading of the agricultural products produced there.

Apart from the organic plant products cultivated and harvested by themselves, in cases where they accept the organic plant products produced by other certified operators and conduct grade labeling, after post-harvest processing, they had to obtain the Re-packer certification to conduct such activities in the past. (e.g. In case organic rice production process managers may accept organic brown rice produced by other certified operators and ship the polished products (after polishing process), in addition to their own processed rice shipment after polishing process, etc.)

But such “Acceptance” activity was added to the required items for the internal rules specified in the revised Technical Criteria for Certifying Domestic or Overseas Production Process Managers of Organic Plants and Organic Feeds (Notification No.1850 of the Ministry of Agriculture, Forestry and Fisheries of Nov. 25, 2005, Latest version was revised on Mar. 29, 2018), because the processes managed by the production process managers are considered to include the processes managed by re-packers.

Now the relevant production process managers shall be able to conduct grade labeling of the plant products accepted from other certified operators as well, after post-harvest processing, while in such case they have to conduct the production process inspection for the processing after receiving the products in order to carry out the grade labeling, in the same way they do for the products that are cultivated and harvest by themselves.

**(Q1-2) In case we harvest 3-4 crops from the same fields in a given year, should we apply for certification of each crop?**

(A1-2)

Since such certification is granted to the relevant field, you can harvest any number of crops a year within its validity once you have obtained certification.

**(Q1-3) Is there any certificate validity period provided for the certified fields or collection areas?**

(A1-3)

Regarding the certified fields, there is not any expiration date specified under the Act on JAS.

After getting certification, they need to undergo inspections by registered certification bodies at least once a year to assure that they comply with the criteria of “fields” or “collection areas” specified in the JAS for organic plants. Registered certification bodies may cancel the certification of production process managers in the following cases or in the case specified in the Article 46-(iii)- Items-(e)(f) of Regulation for Enforcement of the Act on JAS.

- (1) In case where certified operators hand over or display preliminary grading labeled agricultural or forestry products before the actual grading, or they didn't remove or delete inappropriate grading labels, or they affix inappropriate grading labels or any misleading grading labels.
- (2) In case where certified operators are not in compliance with the technical criteria of the certification.
- (3) In case where certified operators violate the improvement order or grading label removal/deletion order, that are issued by the Minister of Agriculture, Forestry and Fisheries in accordance with the Article 39 of the Act on JAS.
- (4) In case where operators fail to comply with the request for the report or documents by the Minister of Agriculture, Forestry and Fisheries in accordance with Article 65-2 of the Act on JAS, or make a false report or submit false documents; or refuse, hinder or avoid the inspection conducted by the officials of the Ministry of Agriculture, Forestry and Fisheries or the staff of the Food and Agricultural Materials Inspection Center in accordance with the same provision or Article 66-2 of the Act on JAS.
- (5) In case where certified operators obtained through unlawful means.

**(Q1-4) Is it possible for the production process administrator for the organic plant products to concurrently act as a grading staff?**

(A1-4)

Although it is desirable for the production process manager not to concurrently act as a grading staff so that each person can carry out each activity appropriately, the same person may conduct both activities subject to the registered certifying body's approval, in case the same person could conduct both activities by oneself, as the certified fields is small enough (small area and small number of fields) to be managed by a single person.

**(Q1-5) How can we calculate the necessary number of production process managers required for the proper management or control of the fields, in consideration of the number of the fields or the dispersion degree of the fields, etc.?**

(A1-5)

It depends on the number of fields or the dispersion state of the fields. In general, the required number of production process managers shall be no less than the number obtained by the number of all fields divided by the number of fields in which one production process manager can manage or control the production process for one year.

**(Q1-6) With reference to 4.1-2)-b) of “Inspection Methods for the Production Process of Organic Plant Products etc., which specifies to “confirmation that the relevant production process management records are related to the relevant production lot”, please let us know how we can verify this?**

(A1-6)

Such verification can be done by checking the relevant lot against the production process management record.

**(Q1-7) Is it possible for the certified production process managers to affix Organic JAS seals to those crops kept in stock, that had been harvested or cultivated before they obtained their certifications.**

(A1-7)

It would be possible for the registered certification bodies to certify the production process managers even when the crops are being cultivated or after the crops have been harvested.

In such cases, the registered certification bodies shall conduct their inspection based on “the technical criteria for the certification of production process managers for organic plants,” including criteria concerning the methods of production such as field conditions, in the same manner as for the regular certification.

In case the crops are being cultivated or have already been harvested, the whole production process management system shall be inspected, including the confirmation as to whether the relevant crops are in conformity with the Organic JAS, based on the production process management records and storage conditions. Certified production process managers, at the time of certification, may carry out grading based on the Organic JAS system and affix Organic JAS logos to the crops, which are being held in the storage after harvest or are still being cultivated.

**(Q1-8) In the event of the transfer of business or organizational changes, is it necessary for the succeeding business operator to obtain a new certification for their production process manager?**

(A1-8)

Due to the amendment of the Act on JAS in 2005, the provision related to the succession of certified operators was deleted, which means, in light of the appropriate and smooth implementation of the organic certification system, it is desirable that any production process managers, who may succeed the business in the case of business transfer, corporate split for succession or inheritance or merger, be re-examined for the certification, because the certification of the operators for grading should be considered individually based on the inspection & grading capabilities of each operator.

In the following cases where the incumbent certified operator and the succeeding business operator are not the same entity, the former should submit a notification of abolition of grading business to the accredited certification body and the latter should apply for the new certification.

(1) In the cases of farmers or privately owned shops etc. where certified individuals may transfer their businesses to the successors.

(2) In case a certified company may become a holding company and transfers its business to the newly founded company.

- (3) In cases where certified agricultural cooperative or corporation or producer cooperative may be dissolved and transfer its business to its members (except for the case where the group members turned out to be only one farmer temporarily).
- (4) In cases where a certified company is reorganized into a privately owned shop, or a certified cooperative is reorganized into a corporation and their businesses are transferred to the new organizations.

In case where the special limited liability companies, which were limited liability companies as of the enforcement date of the Companies Act (May 1<sup>st</sup> 2006), are to be reorganized into corporations and change their trade names accordingly, they don't need to apply for the new certification.

Certification procedures, including the necessary inspection and the collection of fees, should be in conformity with the operation rule provided by each accredited certification body(ACB). So in the cases mentioned above (1)~(4) where ACBs are to skip some part of inspection or reduce fees, they need to specify such provisions in the operation rules accordingly.

**(Q1-9) With reference to the newly provided Clause 9 of “Technical Criteria for Certifying Domestic or Overseas Production Process Managers of Organic Plants and Organic Feeds (limited to those that have undergone only the process of preparation or sorting), which stipulates that “Provided that any prohibited substances be found mixed in the fields for the reasons not attributable to the certified production process managers etc., and if the amount of such prohibited substances is very small, such prohibited substances are deemed not have been used”, please clarify the purpose or meaning of this newly established provision.**

(A1-9)

In cases where any prohibited substances were found mixed in the fields, which would not be in conformity with the provision 1 (Production facilities) specified in the Technical Criteria for certification, it was not clear whether such situations would fall into the provision※ specified in Article 46-(iii)-(e)-1 of Act on JAS as “the certified matters pertaining to the certified business operator no longer comply with the technical criteria for the certification, and they are not likely to comply therewith in the future;”

To be more specific, certified production process managers should not be responsible for the prohibited substances detected in the following cases where the above provision※ (“they are not likely to comply therewith in the future”) should not apply, if the actual amount were very small. This provision-6 has been specified in the Technical Criteria for the purpose of clarifying such point.

- 1) In case the prohibited substances might be accidentally used due to the false information or errors in the relevant documents, even though the certified production process managers have conducted assessment of such substances properly by checking the documents submitted by the substance suppliers/manufacturers.
- 2) In case the prohibited substances might flow into the fields due to natural disaster.

However, even in the above cases, it would not be appropriate to grade those crops (harvested in the relevant fields) as organic plant products, since the relevant fields were found not in conformity with the Criteria of the Facilities for Production.

As such being the case, in consideration of the international best practices, the following provision has been specified in 4 (Inspection of Production Process) of Inspection Methods for Production Processes of Organic Plant Products, Organic Feeds, Organic Livestock, and Organic Processed Foods, which stipulates that “such prohibited substance shall be deemed not to be used for a lot which is harvested on and after the day on which one year has elapsed from the day on which the prohibited substance is mixed”, while such crops as harvested within one year from the date on which the relevant prohibited substance was found mixed, should not be graded.

**(Q1-10) How should we determine whether the amount of such prohibited substance (found mixed in the fields) is very small, which is specified in Clause 9 of “Technical Criteria for Certification” and the provision 4.1-2) of “Inspection Methods for the Production Process of Organic Plant Products etc.”?**

(A1-10)

As to whether the amount is “very small” or not, which may vary depending on the nature/types or actual usage of the relative prohibited substances, it would be difficult to generalize, while we may assume the following cases:

- (1) In the cases where prohibited substances were used  
Basically, we should make a judgement about the nature/types or actual usage of the relative prohibited substances, in comparison with the general cases where such substances are used. For example, we may focus



on the following points to make a judgement.

- (a) Compare the calculated amount of prohibited substance found mixed in the fields (based on the ratio of prohibited substance in the total substance used or based on the dosage/unit) with the dosage criteria, customary practice amount level etc.
  - (b) Compare the actual (used) dosage of prohibited substance with the recommended dosage (recommended by the manufacturers etc.)
- (2) In case prohibited substance flowed into the fields due to the disaster  
In this case the amount of prohibited substance found mixed in the fields should always be considered “very small”, because in general earth and sand etc. would be removed in the case of landslides and flood waters would recede in the case of floods.

**(Q1-11) In case any prohibited substances were used for pest control in a field etc. in accordance with the Plant Protection Act (Act No. 151 of 1950), how would such field (where prohibited substances were used) and the relevant plant products (cultivated by using such prohibited substances) be handled?**

(A1-11)

1. In the cases where such agricultural chemicals etc. (which are prohibited substances) were used in the organic JAS certified fields for pest control in accordance with the Plant Protection Act (Act No. 151 of 1950), certification for the relevant fields should be maintained in accordance with Clause 9 of Technical Certification Criteria for Production Process Managers of Organic Plant Products, since the pest control based on the Plant Protection Act is necessary measures to prevent the spread of noxious animals and plants (if proper measures were not taken, pests and diseases could spread throughout the region), which does not fall within the requirements (defined in Article 48-(1)-(iii)-(e) of Act on JAS) for the cancellation of certification due to failure to comply with the technical criteria for the certification.
2. Such plant products (cultivated by using such prohibited substances) shall be handles in the following manner.
  - (1) In the cases where such prohibited substances were used in field, cultivation site or collecting/harvesting area, grading is not possible for those production lots harvested from the date when the prohibited substances were used until the day on which a year has elapsed, but those production lots harvested thereafter may be graded, as prohibited substances are deemed not have been used in accordance with 4.1-1) of “Inspection Methods” for Organic Plant Products.
  - (2) In the cases where such prohibited substances were used in the place for raising seedling or the place where the seeds or seedling (to be used in the fields) were cultivated, grading is possible, as prohibited substances are deemed not have been used in accordance with 5.4.4 of 5.4 (Seeds or seedlings to be used in the fields), which stipulates that such prohibited substances (excluding those showing a lasting effect in the fields after planting) may be used.

**(Q1-12) With reference to “Pest control in accordance with Plant Protection Act (Act No. 151 of 1950)”, as mentioned in Clause 9 of Technical Certification Criteria of Production Process Managers of Organic Plant Products, what kind of pest controls should fall into such category?**

(A1-12)

Such Pest control in accordance with Plant Protection Act (Act No. 151 of 1950)”, which is mentioned in Clause 9 of Technical Certification Criteria of Production Process Managers of Organic Plant Products, should include the following pest controls.

- 1) Those pest controls as ordered by the Plant Protection Officer in accordance with Article 4-(2) of Plant Protection Act.
- 2) Those urgent pest controls in accordance with Article 17-2 of the same Act
- 3) Those pest controls based on the compliance matters specified in the comprehensive pest control plan provided by the prefectural government in accordance with Article 22-3 -(3) of the same Act
- 4) Those pest controls in dealing with unusual outbreaks of pests, which are provided by the prefectural governors as ordered by the Minister of Agriculture, Forestry and Fisheries in accordance with Article 24-(1) of the same Act
- 5) Those pest controls based on the prefectural ordinances in order to take measures in accordance with Article 29 of the same Act
- 6) Those pest controls based on the instruction/guidance of the Plant Protection Officer in accordance with Article 17 of the same Act

**(Q1-13) With reference to the agricultural and forestry products specified in the Article 48-(i)-(d)-11 of Regulation for Enforcement of the Act on Japanese Agricultural Standards (Order of the Ministry of Agriculture and Forestry No. 62 of June 9, 1950), that are generally expected to be consumed in “1 year or more” or “less than 1 year” from the shipment in case “use by and best before dates” are not indicated, what are those product items specifically in each case respectively?**

(A1-13)

Such period of time does not refer to the calculated time based on the individual shipping circumstances, but it refers to a generally expected period of time for each agricultural product between when the product is shipped and when the product is consumed.

Those products that can generally be stored for a long time, such as soybeans, brown rice, wheat, “*aracha*” (unprocessed tea), and frozen meat etc., would fall into the category of “1 year or more”.

Those products that cannot be stored for a long time, such as polished rice, vegetables (root vegetable, leafy vegetable, mushrooms, edible wild plants), fruits, defrosted meat, milk, eggs etc., would fall into the category of “less than 1 year”.

**(Q1-14) With reference to 7.1 -d) of Technical Certification Criteria for Production Process Managers of Organic Plant Products and Organic Feeds, which stipulates “Handling of a lot found to be non-compliant with JAS 1605 or JAS 1607 after shipment”, as a necessary item to be specified in the “Grading rules”, what should be provided specifically in this grading rule?**

(A1-14)

It is necessary to stipulate that certified operators should take the proper measures, such as “informing the relevant distributors that the relevant lot is not in conformity with organic JAS any longer”, so that the relevant distributor may remove or delete the grade labeling of the relevant lot, (which is found to be non-compliance with JAS for organic plants etc., after shipment), properly in accordance with Article 41 of Act on JAS.

## **2. Production Process Manager for Organic Processed Foods**

**(Q2-1) If we are to make vegetable salads in the supermarket by using organic vegetables and affix Organic JAS seals to them, is it necessary for us to be a certified production process manager of organic processed foods?**

(A2-1)

As those vegetable salads etc., where variety of fresh-cut crops are blended into a commodity (like organic vegetable salad etc.), would fall into the category of organic processed foods, such processor at the supermarket needs to be a certified production process manager in order to sell them with Organic JAS logos.

**(Q2-2) Should the production process management be carried out by a single person alone? In case the production process management involves multiple people, should all of them be certified operators?**

(A2-2)

1. The production process may not always be managed by a single person alone, as shows below:

1) All persons involved in the production process of organic plants may create a group, obtain such production process manager certification for the group as a whole and carry out the production process management accordingly as shown in the following examples.

a) Commercial farms and rice polishing facilities etc. may create a group

b) Manufacturing Factories and packaging factories etc. may create a group

In these cases, “names and addresses” of all group members shall be specified in the certification application form in accordance with Article 28, Paragraph 1 of the Regulation for Enforcement of the Act on JAS.

2) While the commercial farms of organic plant products or manufacturer of organic processed foods may be certified as production process managers and conduct the management of some part of the production processes by themselves, they would delegate the management task for other part of the production processes to other sub-contractors. (This is so-called outsourcing management. Even in such cases, certified commercial

farms or certified manufacturers need to affix organic JAS seals to their products by themselves)

2. Furthermore, all the production process management is to be carried out under the responsibility of the production process managers, regardless of whether the whole process is certified (or some part of the process is certified but the rest is outsourced), while commercial farms and manufacturers are to be certified for their designated field or business office respectively.

For that matter, at the time of certification, any fields or business offices involved in the production process shall be designated as such and the certified operators should manage or control the production process there accordingly.

(When you apply for certification, you must specify the “name and location ” of all the fields, factories or business offices involved in the production processes, on the application form in accordance with Article 19-3 of the Regulation for Enforcement of the Act on JAS. Should there be any additions or changes regarding the fields, factories or business offices involved in the production process, you must submit a request for the necessary amendments to the certification bodies accordingly.)

**(Q2-3) Aren't the certified overseas production process managers of organic processed foods allowed to produce and sell organic processed foods, unless they use organic JAS certified ingredients bearing organic JAS seals?**

(A2-3)

Regarding the organic plant products, organic livestock products, and organic processed foods, which are certified under the relevant equivalency country's organic system and the organic equivalency arrangement between Japan and the relevant equivalency countries, in the designated countries (designated by the Ordinance of Competent Ministry as having an equivalent grading system to the JAS grading system in accordance with the Article 12-(2) of the Act on JAS), certified importers are permitted to affix Organic JAS Seals to those certified products when they are imported into Japan, because their production standards and distribution arrangements etc. in the relevant countries are deemed equivalent to those of organic JAS certified products (such as organic plant products, organic livestock products and organic processed foods)

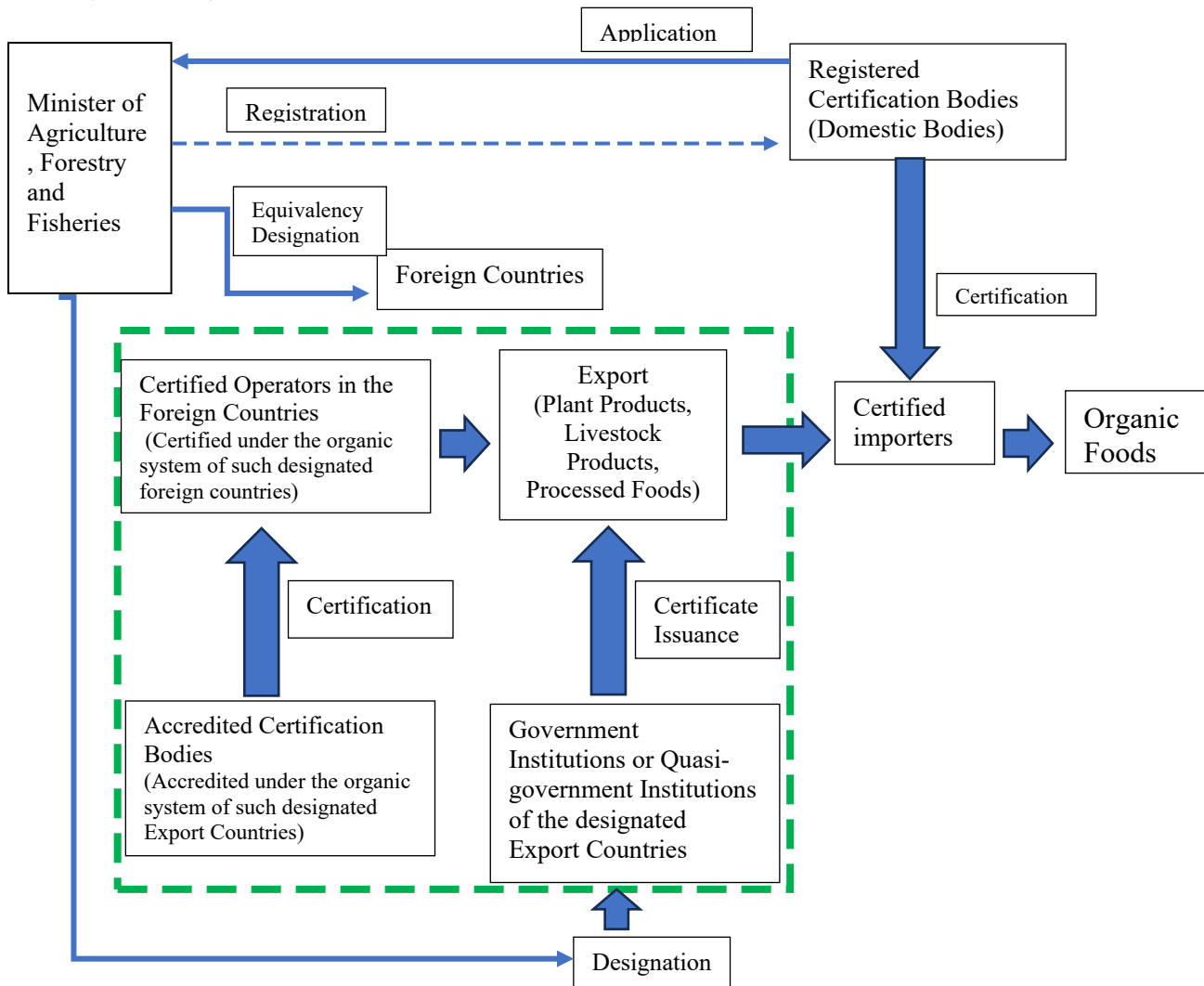
For that matter, certified overseas production process managers of organic processed foods in those “designated countries (designated by the Ordinance of Competent Ministry as having an equivalent grading system to the JAS grading system in accordance with the Article 12-(2) of the Act on JAS)” are permitted to produce or process organic processed foods by using those organic plant products, organic livestock products or organic processed foods as raw materials, which are certified by the grading system of the relevant equivalency countries (including those graded in other designated third countries under such arrangements (agreed) between Japan and the relevant equivalency countries), which shall apply only to those agricultural products within the scope of the equivalency arrangements with the relevant countries.

**(Q2-4) Is it permissible for the overseas organic certified operators (certified under the grading system of a foreign country, with which Japan has organic equivalency arrangement) to grade plant products, livestock products and processed foods of plant origin, and attach Organic JAS seals to those products by themselves in accordance with their own country's organic system as well as the organic equivalency arrangement agreed between the relevant foreign country and Japan?**

(A2-4)

Overseas operators certified under the grading system of the foreign countries (including regions. the same shall apply hereafter in this question) with whom Japan has established equivalency arrangements (hereinafter referred to as "overseas certified operator") are not permitted to affix Organic JAS seals to plants and processed foods of plant origin which have been graded under the relevant foreign country's own grading system. In accordance with the Article 12-(1) of the Act on JAS in Japan, only those organic JAS certified importers are permitted to affix grading labels to those plants and processed foods of plant origin, which have been graded under the grading system of the foreign countries that have the equivalency arrangements with Japan. However, in case certified importers entrust their task of affixing organic JAS seals to the overseas certified operators, such entrusted operators are permitted to affix organic JAS seals to the relevant products in accordance with their consignment agreement accordingly.

(Reference)



**(Q2-5) In case the organic *Natto* (fermented soybeans) product packaged with packets of *tare* sauce and *karashi* mustard is to be sold, is such *Natto* product (consisting of *Natto* by itself, and packets of sauce and mustard) considered as organic processed food?**

(A2-5)

In case we sell organic *natto* together with sauce and mustard (without mixing them together with the organic *natto*), the sauce and mustard are regarded as separate processed foods attached to the organic *natto*. So, if the relevant *natto* itself were an organic processed food, you would be able to label such packaged product as “organic *natto*.”

Labeling examples:

- a) Organic *natto* (with mustard and sauce) ※Note 1
- b) Organic *natto* (with organic sauce) ※Note 2

※Note 1: a) In case both mustard and sauce are not organic foods.

※Note 2: b) Organic JAS seals must be affixed to the “organic sauce” as well.

**(Q2-6) Whereas the production process managers of organic plants and organic feeds are now able to carry out “re-packing” in accordance with the revised “Technical Criteria for Certifying Domestic or Overseas Production Process Managers of Organic Plants and Organic Feeds (revised in Mar. 29,2018), isn’t it possible for the production process managers of organic processed foods to carry out re-packing of organic processed foods as well, even though the Technical Criteria for them has not been amended?**

(A2-6)

Production Process Managers of Organic Processed Foods may also be able to conduct their inspection of the production process after the acceptance of the certified products from other operators and carry out grading or grade-labeling.

As the provision for the acceptance of the ingredients has already been specified in the Technical Criteria for Production Process Managers of Organic Processed Foods, we don’t need to revise such technical criteria at this point, while it would be possible for such production process managers of organic processed foods to conduct repacking of such organic processed foods without revising the relevant technical criteria.

However, production process managers of organic processed foods are not permitted to carry out the repacking of organic plant products, since they are not allowed to conduct grading of organic plant products.

### **3. Domestic or Overseas Production Process Managers of Organic Livestock**

**(Q3-1) What are the requirements for becoming a certified production process manager of organic livestock products?**

(A3-1)

Such managers or controllers for the production process of agricultural and forestry products are specified in the Article 27 of the Regulation for Enforcement of the Act on JAS as shown below:

- 1) Product handler of the Livestock products
- 2) Corporation comprising product handler(s) of the Livestock products (including an association or foundation without legal personality which has a provision for the representatives or custodians)  
Organic beef handlers, for example, should include beef cattle fattening farms, cattle (calves) breeding farms and livestock slaughterers etc.

**(Q3-2) How can livestock operators affix grading labels to their products?**

(A3-2)

Livestock operators need to obtain the product process manager certification in the following ways in order to attach grading labels to their products:

- 1) Livestock slaughterers and livestock farms may be jointly certified as a production process manager.
- 2) Livestock slaughterer may be independently certified as a production process manager.

## **II Re-packers**

**(Q4-1) What kind of business operators are included in the scope of certified Re-packers of organic products?**

(A4-1)

In general, “Re-packing” is defined as “to subdivide those once divided parts into smaller parts”, which means to convert the unit of supplies into smaller units by cutting or repacking etc. On the other hand, we may change the small distribution unit into a larger unit by packing up in the boxes or bags etc., which may also be considered as repacking activities.

According to the Article 11 of Act on JAS, “Re-packer”, being defined as “one who subdivides and sells the products on their own”, may affix the same grade label to the relevant products after the subdivision of consignment. Their line of business could be wholesalers, middle traders, retailers etc.

In cases where various types of food products are mixed for the re-packing, such activities are considered as

“processing activities” and are not allowed under the certification of the re-packers, because mixing various types of products may create additional attributes.

(However, in cases where various types of organic vegetables, for example, are re-packed in a box to be sold as “Organic Vegetable Set” based on the assumption that consumers would consume such mixed foods separately, such activities are not considered to create any additional attributes and are allowed under the certification of the re-packers.)

In cases where the same type of organic processed foods would be mixed for re-packing, such activities would not be considered to create any additional attributes and are allowed under the certification of the re-packers. However, in the case of tea etc. where such mix-packing is aimed for improving the taste by blending, certification for the production process managers of organic processed foods would be required because additional attributes are deemed to be created in such cases.

On the other hand, whereas the certified operators may carry out the ripening activities for organic JAS certified bananas or kiwifruits by using ethylene, re-labeling of organic JAS seals would not be required as long as they carry out only ripening activities by using ethylene without re-packing.

**(Q4-2) If we are to carry out repacking of organic processed foods at the backyard of a supermarket, should we become certified Re-packer?**

(A4-2)

It depends on the circumstances of each case as shown below:

Case-1: Re-packer Certification would not be required for the repacking of organic plant products at the backyard of a supermarket etc. under the following conditions or circumstances, because organic JAS seals shall not be newly affixed to the re-packed products.

- 1) Some measures should be taken to ensure coherence and consistency between the identities of organic plants and the descriptions of the attached Organic JAS seals. (e.g. Setting up an Organic Plants Corner separately to prevent any accidental mix-ups with any other plant products.
- 2) After taking out the products from the original packaging and repacking them, sales activities should be conducted by displaying the relevant Organic JAS seals (removed from the empty packages) in close proximity.

(The following re-packing manners (after taking out the products from the original package) would be allowed in this Case-1: a) Piling up the products, b) Putting them on the plates, c) Re-packing them in bags or containers, d) Cutting them up and selling the pieces, and e) Cutting them up and wrapping the pieces) In such cases you are not allowed to describe the words meaning “organic” on the containers or the packages of re-packed plant products, because we could not maintain the integrity of the posted organic JAS Seals and the description of “Organic” on the packages or containers in case the consumers may carry around the repacked products, whereas the labeling description for “Organic” etc. and the organic JAS Seal labeling should always be provided in an integrated manner.

So, if you intend to describe “Organic” etc. for the re-packed products without becoming a certified re-packer, please display “Organic” etc. on the pop-up displays in close proximity to the place where organic JAS seals are posted.

Case 2: Re-packer Certification would be required for the repacking

In cases where you intend to describe the words “organic” etc. on the containers or packages of re-packed plant products (including the case of “Cutting them up and selling the pieces”), or you need to newly attach the organic JAS seals to these containers or packages, you need to be a certified re-packer.

**(Q4-3) In case we purchase organic JAS certified brown rice (to which Organic JAS seal is attached) and sell polished white rice in repacked packaging or mixed organic rice packaging with Organic JAS logos, should we become organic JAS certified Production Process Manager or organic JAS certified Re-packer?**

(A4-3)

As the rice polishing or rice blending activities are not considered as “Processing”, you need to become a certified re-packer of organic plant products rather than a certified production process manager of organic processed foods.

On the other hand, in cases where the organic JAS seals are not attached to the rice packaging bags (such cases as; selling the polished white rice directly to the consumers at the store, immediately after polishing the organic JAS certified brown rice designated by the consumers there), you don’t need to be a certified re-packer.

**(Q4-4) With reference to the technical criteria for certifying Re-packers, is it possible for the same person to act concurrently as a “Re-packer” and a “person in charge of grading label”?**

(A4-4)

It would be possible for the same person to act concurrently as a “re-packer” and a “person in charge of grading label”, if the accredited certification bodies acknowledged that both activities may be carried out by the same single person, while it is recommended that re-packing and grade-labeling activities be carried out by the different persons so as to carry out each task properly.

**(Q4-5) Is it permissible for the retailers, that have not obtained re-packer certification, to engage in those activities such as removal of wilted portions of organic spinach?**

(A4-5)

As the simple tasks such as removing wilted spinach portions does not fall under the criteria of re-packing activities, even non-certified operators are permitted to carry out such task.

**(Q4-6) If we are to repackage the alcohol beverage products and reapply Organic JAS seals to the relevant organic products at the liquor stores (in the case of rebottling, tasting or “*Kakuuchi*” (paid tasting)), is it necessary for us to obtain Organic JAS Certification for Re-packers of organic processed foods?**

(A4-6)

From 1<sup>st</sup> Oct.,2025 onwards, as the transitional measures will end, it would be necessary to affix organic JAS seals to the organic alcohol beverages, if they are to be labeled as organic. On the other hand, only the certified re-packers can affix organic JAS seals to the re-packed products again after re-packing.

For this reason, should alcohol beverages be re-packed in other containers at the liquor store and labeled as “Organic”, it would be necessary to obtain Re-packer Certification for Organic Processed Foods and affix organic JAS seals to the re-packed organic alcohol beverages, regardless of rebottling, “*Kakuuchi* (paid tasting)”, or tasting.

However, such regulation does not apply to the cases where the description “Organic” is used and displayed on the menus or leaflets (other than the products and their packages, containers, or invoices) at the “*Kakuuchi* (paid tasting)” etc.

**(Q4-7) In the cases where a re-packer owns multiple re-packing facilities, should such re-packer obtain certification for each facility?**

(A4-7)

Whereas we have received a lot of questions on this, since it is not clearly stated how Re-packer Certification should be granted to a re-packer who owns multiple re-packing facilities, we have reconsidered how re-packer certification should be granted in such case this time and come up with the conclusion that we can handle such multiple re-packing facilities under one certification, provided that all the facilities are centrally managed by the relevant re-packer as specified below.

- 1) Re-packing managers must create and execute the re-packing process plan for all the re-packing facilities for certification and take measures or provide guidance if there’s any abnormalities etc. occurred in the process.
- 2) All the multiple re-packing facilities for certification must be centrally controlled under the common internal rules (for re-packing and grading) provided by the applicant
- 3) Re-packing managers must confirm that such management mentioned in 2) shall be operated without fail.

**(Q4-8) Whereas the provision-7.1 of Technical Criteria for certifying Re-packers stipulates that “the grade-labeling department must be independent from the operational units substantially, having independent authority”, however, in the cases where the grade-labeling staff may have to carry out operational activities as well due to the staff shortage, what should we do?**

(A4-8)

1. Those operators (such as re-packers, importers, foreign grade labeling operators), who do not conduct grading for grade-labeling, are required to ensure that the grade-labeling department must be independent from the operational units substantially, having independent authority, to ensure the objectivity of the grade labeling.
2. In order to cope with such requirement, basically, the point is to clearly separate grade-labeling department

from the operational units and create a functional structure, avoiding duplicate staff.

On the other hand, even in the cases where it might be difficult for the re-packers, importers, and foreign-grade labeling operators to meet this requirement (which defines “substantial” independence from the operational units) due to the limited number of staff etc., it would be considered that the relevant grade-labeling department is independent from the operating units substantially, having independent authority, provided that the objectivity of the grade-labeling is ensured in the following manner.

- 1) Regarding the tasks for the grade-labeling staff, it is stipulated under the internal grade-labeling rules that the grade-labeling staff must confirm (by checking the relevant records) a series of processes as their responsible tasks (from receiving agricultural products to shipping, including re-packing/grade-label affixing/storing) have been carried out properly before shipping the relevant grade-labeled agricultural and forestry products.
- 2) Such grade-labeling activities are carried out in accordance with the above 1) internal rule.

### III Importers

**(Q5-1) Is it permissible for the importers or re-packers to delegate some of their tasks, such as storage, re-packing, or grade labeling etc. for the imported plant products or re-packing plant products, to the warehouse companies?**

(A5-1)

- (1) They are not allowed to delegate such grade labeling task to non-certified warehouse companies, because grading labels must be attached by certified operators themselves.  
Should any importers or re-packers need to delegate some of their tasks (such as storage, repacking or grade-labeling) to warehouse companies, they must undergo their certification assessment together with the relevant warehouse companies in an integrated manner and become certified importer or certified re-packers.
- (2) To get certified in this way, they need to state their group name in the “name and address” field of the application form and specify the names of its consisting members such as importers, re-packers, and warehouse companies etc. as well, in accordance with provisions specified in Article 26-(i) and Article 28-(i) of the Regulation for Enforcement of the Act on JAS.
- (3) In cases where individually certified operators are to change their certification to unified certification including warehouse companies or unified certification operators are to change their warehouse companies or change their unified certification to individual certification, they need to submit such change notification to their accredited certification bodies accordingly.

**(Q5-2) What packaging activities are the certified importers allowed to perform within the scope of their certification?**

(A5-2)

Certified importers may be able to attach grading labels to imported agricultural and forestry products or the packages, packing containers or invoices of such products.

In principle, they would attach the grading labels to the packages or containers as it is when imported to Japan. However, in the following cases, they may attach the grading labels to the new re-packaged containers or packages.

- 1) In cases where the imported containers or packages were found broken or damaged or unsuitable for the domestic distribution in Japan and such products need to be re-packaged or transferred to equivalent containers,
- 2) In case two or more imported prepackaged products are to be bundled and re-packed in a new box or container, as it is, etc.

Besides, certified importers are not allowed to re-pack, blend, polish, or process imported agricultural and forestry products.

**(Q5-3) In case the importers import plants or processed foods of plant origin labeled as “organic” in a foreign language and put them on the market without attaching any organic labels written in Japanese, is it necessary for such importers to be certified?**

(A5-3)

In the cases where you import plant products, livestock products and processed foods (Processed foods of plant origin, Processed foods of livestock origin and Processed foods of plant and livestock origin (except for those excluded from the scope of organic JAS processed foods, such as honey etc.)), which are labeled as “Organic” or “ORGANIC” in English, you need to be a certified importer and affix Organic JAS seals to such imported



products, because such English label descriptions would be confused with “オーガニック XX” or “XX (オーガニック)” (meaning “organic” in Japanese) specified in 6.1 of the JAS for Organic Products of Plant Origin, 6.1 of the JAS for Organic Livestock Products and 6.11 of the JAS for Organic Processed Foods.

Any products labeled as “organic” in any other language shall be handled in the same manner, because such labeling could be misleading and affect the consumers’ choices of products.

**(Q5-4) In case we import organic products produced in country B (in accordance with the organic system of country A) via country A, under our organic equivalency arrangement with country A, as organic equivalency arrangement is not available with country B, is it possible for us to attach Organic JAS logos to the products based on the certificate issued by country A?**

(A5-4)

1. No, certified importers are not permitted to affix grade labels to the organic products produced in Country B, because Country B does not have an organic equivalency arrangement with Japan.  
Only in the cases where all the following requirements are met, certified importers are permitted to affix grading labels to the imported designated agricultural and forestry products※, which have been graded under the overseas systems: ※Organic plant products, Organic livestock products and Organic processed foods (Organic processed foods of plant origin, Organic processed foods of animal origin and Organic processed foods of both plant and animal origin)
  - a) Export countries of the organic products have the organic equivalency arrangements with Japan.
  - b) the products are produced and graded in those equivalent countries; and c) the relevant certificates issued by the governmental organizations or quasi-governmental organizations of the equivalent countries or their copies are attached to the products.

Please note that the type of products, for which the relevant governments could issue certificates, may be different depending on the requirements specified in the equivalency arrangements with Japan. For this reason, when you are to affix the organic JAS seals, you need to confirm whether the relevant export countries and their certified products are in conformity with the provisions specified in the Article 30 of the Regulation for Enforcement of the Act on JAS.

2. On the other hand, with reference to the above b), according to the equivalency arrangement between Japan and the U.S. & Canada, such agricultural products produced in the third country may be included if they are graded and packaged in accordance with the organic standards of the relevant equivalent countries. For further information on the organic products import from the U.S. & Canada, please refer to following web page.  
[https://www.maff.go.jp/e/policies/standard/jas/specific/Organic\\_equivalency.html](https://www.maff.go.jp/e/policies/standard/jas/specific/Organic_equivalency.html)

**(Q5-5) In case we import organic foods graded in Country A via Country B and affix Organic JAS seals to the imported foods, whereas our organic equivalency arrangements are established with both countries A and B, which country’s certificate shall be required for us?**

(A5-5)

1. In cases where the designated agricultural and forestry products※, which are produced and graded in Country A and imported to Country B to add new attributes, are to be exported to Japan, necessary certificate should be issued by the governmental organizations or quasi-governmental organizations of Country B as the exporting country for Japan. (※Organic plant products, Organic livestock products and Organic processed foods (Organic processed foods of plant origin, Organic processed foods of animal origin and Organic processed foods of both plant and animal origin))
2. In the cases where the products are once imported into Country B but are exported to Japan from Country B without adding any new attributes, certified importers are permitted to affix Organic JAS seals to the products by obtaining either of the following two (① or ②) documents.
  - ①Certificates issued by the governmental organizations or quasi-governmental organizations of Country A, or
  - ②Certificates issued by the governmental organizations or quasi-governmental organizations of Country B and the relative documents showing the name and address of the certification bodies in Country A, who have conducted the activities equivalent to the certification of the designated agricultural and forestry products by the certified production process managers etc.

Such documents showing the name and address of the certification bodies in Country A would include the followings:

- a) Transaction Certificates issued by the certification bodies in Country A for the transaction between the

production process managers etc. in Country A and the operators in Country B.

b) Certificates etc. of the production process managers etc. in Country A

In this case, invoices etc. (issued for the export from Country A to Country B) should also be required to identify agricultural products (exported to Japan) as being the relevant designated agricultural and forestry products.

1. You might determine whether any new attributes are added in the case of tea etc. for example as follows: In case you are to blend different types of teas to improve the quality, the relevant certificates issued by the governmental organizations or quasi-governmental organizations of Country B would be required, as new attributes are deemed to be added in such cases.
2. In case both Country A and Country B are the EU member countries, certified importers would be able to affix organic JAS seals to the relevant organic plant products and/or organic processed foods of plant origin if the relevant certificates issued by the governmental organizations or quasi-governmental organizations of any EU member countries are available.

**(Q5-6) In case we import certified organic foods from our organic equivalent countries and use them as ingredients for our organic processed foods, is it possible for our importers to take delivery of the laden import container direct to our factories without being kept in storage at the warehouse and attach organic JAS logos to such imported foods at their factories?**

(A5-6)

1. In case the production factory facilities of the organic processed foods meet the requirements specified in the Clause-4 (Receiving & Storage Facilities for Imported Products) of Technical Criteria for Certifying Importers of Organic Plants and Organic Processed Foods of Plant Origin, importers are permitted to take delivery of the consignment direct to the production factory, whereas the relevant factory should be included in the scope of the certification as the "Receiving & Storage Facilities for Imported Products" specified in the above-mentioned Technical Criteria.
2. As the title of the imported goods shall be transferred at the production factory of organic processed foods, such importers need to deliver the relevant goods to the production factory, after checking if the details of the certificate (issued by the governmental organizations or quasi-governmental organizations of the equivalent countries) are matched to the quantity shown on the invoices etc. of the relevant agricultural and forestry products and attaching the Organic JAS seals to the products accordingly.  
In case the certified importers delegated their authority to affix the Organic JAS seals to overseas certified operators in the export countries, the certified importers need to deliver the relevant goods to the production factory, after confirming that the appropriate Organic JAS seals are affixed to the relevant imported agricultural and forestry by checking the above certificates, etc.

**(Q5-7) Regarding the provision - 7.2.1 – f) of the Technical Criteria for Certifying Importers of Organic Plants and Organic Processed Foods of Plant Origin, which stipulates that part of the certified importers' tasks may be consigned to the certified operators of the organic equivalent countries, what kind of services does this ("the part of the tasks") mean specifically?**

(A5-7)

"The part of the service concerning grading labels" which can be consigned to the certified operators of the organic equivalent countries by the certified importers, is the task of affixing organic JAS seals to the designated agricultural and forestry products.

**(Q5-8) Please explain the situations where certified operators in the organic equivalent countries can affix Organic JAS seals to the designated agricultural and forestry products before exporting them to Japan, under the sub-contract agreement with the certified importers?**

(A5-8)

1. Certified importers may import designated agricultural and forestry products produced by the certified operators under the relevant grading system of the foreign countries with which Japan has organic equivalency arrangements (hereinafter referred to as "overseas certified operators"), check the description of the certificates and affix the Organic JAS seals, but in case the overseas certified operators prefer to affix the Organic JAS seals by themselves, certified importers may import the products to which the Organic JAS seals would be affixed under the subcontract agreement beforehand.
2. In that case, to ensure that the Organic JAS seals should be affixed appropriately, the overseas certified

operators need to take part in the training programs (including those provided by the websites or e-mails etc.) to understand the key points for affixing Organic JAS seals and if necessary, the certified importer need to ask the overseas certified operators to report back on their activities of affixing the organic JAS seals and confirm their performance accordingly.

3. Please note that the above measures have been introduced to simplify the procedures, as it was pointed out that the conventional measures, where the certified importers are supposed to affix the organic JAS seals to the organic foods exported to Japan by themselves, might be a hindrance to the smooth trades.

So, the certified importers are requested to understand the purpose of this simplified procedures and delegate the task (of affixing Organic JAS seals) to the overseas certified operators unless there are any justifiable reasons to do otherwise, in case overseas certified operators prefer to affix the Organic JAS seals by themselves.

<p><b>(Q5-9) In the cases where certified importers may consign labelling activities (attaching Organic JAS seals to the products) to the certified operators in the organic equivalent countries, what about the details of such sub-contract agreement or consignment agreement?</b></p>
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(A5-9)

Sample contract note is shown below: Certified importers need to specify the details of the consigned tasks in the grading label provisions of such contract in advance.

Consignment Agreement for entrusting the task of affixing JAS Seals (Logos)  
(In case the Party-B is the U.S. certified operator)

This Consignment Agreement (hereinafter referred to as "Agreement") for entrusting the task of affixing JAS Seals (logos) (hereinafter referred to as "logos") to organic plant products, organic livestock products and organic processed foods (limited to those that are graded under the USDA-NOP rules, hereinafter referred to as "organic foods") is made on (Date) by and between A Japanese importer certified by a Registered Certifying Body in accordance with the provision of Article 12 of Act on Japanese Agricultural Standards (Act No. 175 of 1950) (hereinafter referred to as "The Party-A") and an organic operator certified under the USDA-National Organic Program (NOP) in the U.S. (hereinafter referred to as "The Party-B") under the following terms and conditions:

Article 1 (Entrusting Agreement)

Whereas the Party-A shall entrust the following tasks (hereinafter referred to as "tasks") to the Party-B and the Party-B shall accept such tasks on behalf of the Party-A.

- (i) The Party-B shall appoint a person in charge of affixing logos, and need to make the relevant appointed person understand the contents of the relevant documents (designated by the Party-A), such as the types of organic foods (to which logos are to be affixed), the format of the JAS Seal (logo), and how to write an invoice, etc.
- (ii) The Party-B shall attach logos, which are designated or provided by the Party-A, to the organic foods shipped to the Party-A.
- (iii) The Party-B shall attach the invoice (which includes product names, lot numbers, quantities and shipping dates of the relevant organic foods to which logos are affixed) to the organic foods shipped to the Party-A and keep a copy.
- (iv) The Party-B shall respond appropriately to inquiry (on the affixing of logos) from the Party-A.

Article 2 (Consignment Fees)

Party-B may not charge any commissions or fees for the consigned task.

Article 3 (Period and renewal)

The term of this Agreement shall be effective, starting and ending in DD, MM, YY to DD, MM, YY.

Unless either party provides written notice of termination to the other party at least three months prior to the expiration of the initial or such extended term, this Agreement shall be automatically extended for successive one-year periods under the same terms and conditions contained herein.

Article 4 (Subcontracting)

In the event that the Party-B needs to subcontract all the tasks (hereinafter referred to as "Subcontracting") to the third party (limited to the organic operators certified under the USDA-NOP in the U.S.), the Party-B shall obtain the prior approval of the Party-A for such subcontracting.

In the cases where the Party-B subcontract the task to the 3<sup>rd</sup> party subject to the Party-A's prior approval, the Party-B may engage a subcontractor to perform the same obligations of the Party-B, and the Party-B shall be fully responsible for the subcontractor's performance.

Article 5 (Confidentiality)

Either Party shall not disclose any confidential information obtained through the execution of the task to any third party during the period and after the end of Agreement and shall not use such information for any other purpose (other than the execution purpose of Agreement).

Article 6 (Warranty, liability for defects)

Should the Party-B cause Party-A serious defect in execution of consigned task specified in Agreement, the Party-A is entitled to claim damages to the Party-B and the Party-B shall bear all the costs involved.

Article 7 (Termination)

Either party is entitled to terminate Agreement immediately without notice or without following any procedures, under any of the following cases.

- (i) In case the certification of either party is suspended or canceled by the Certifying Bodies.
- (ii) In case either party is in breach of Agreement and such breach has not been remedied after the Notice and Demand for some reasonable period of time,
- (iii) In case there is any material ground, such as serious act of betrayal by either party, that makes it difficult to pursue the Agreement.

Article 8 (Matters for Consultation)

Matters not stipulated in this Agreement and matters of doubt arising in the interpretation of the provisions specified in this Agreement shall be settled by consultation between the Party-A and the Party-B.

In witness whereof, the parties hereto have caused this Agreement to be executed by their representatives in duplicate, each party retaining one (1) copy thereof respectively.

XX, XX, 20xx

The Party-A	Address
Company Name	
	Representative Name
The Party-B	Address
	Company Name
	Representative Name

**(Q5-10) In the cases where certified importers may consign labelling activities (attaching Organic JAS logos to the products) to the certified operators in the organic equivalent countries, is it necessary for the overseas operators to pay any fees to the certified importers?**

(A5-10)

Please note that the certified importers should not impose a financial burden on the overseas certified operators in a consignment agreement, because such task of attaching Organic JAS logos should be conducted by the certified importers in the first place, whereas the certified importers may entrust to the operators certified under the grading system of foreign countries with which Japan has organic equivalency arrangements (hereinafter referred to as "overseas certified operators"), and such task may be carried out by the overseas certified operators on behalf of the certified importers.

**(Q5-11) With reference to 7.2.1 – f) of the Technical Criteria for Certifying Importers of Organic Plants and Organic Processed Foods of Plant Origin, which is provided in the “Grading label rules” in case the certified importers consign labelling activities (attaching Organic JAS logos to the products) to the overseas certified operators, what does this (“Matters concerning the supervising”) mean specifically? Would you be more specific?**

(A5-11)

“Matters for supervising an entity” should be the necessary matters required for confirming that the consigned task (consigned by the certified importers) of affixing the organic JAS seals is properly carried out and asking the overseas certified operators to report back, as needed.

To be more specific, the following matters should be specified:

- (i) matters relating to the instructions regarding the appropriate way of affixing the Organic JAS seals and the quantity management techniques,
- (ii) matters relating to the report on the records of affixing Organic JAS seals,
- (iii) matters relating to the report on the quantity management of Organic JAS seals.

With reference to the supervision by the assignee, excessive burden should not be imposed on the overseas certified operators as assignees, because such supervision should be carried out to the minimum extent necessary only to ensure the appropriate affixing of the organic JAS seals.

**(Q5-12) In the cases where certified importers may consign labelling activities (attaching Organic JAS logos to the products) to the certified operators in the organic equivalency countries, what kind of training programs shall be required for the grade labelling staff assistant working for outsourced contractor?**

(A5-12)

1. In case the certified importers are to assign their task to attach Organic JAS seals to the operators certified under the grading system of foreign countries with which Japan has organic equivalency arrangements (hereinafter referred to as "overseas certified operators"), the overseas certified operators need to understand the key points for affixing the organic JAS seals and carry out such task properly. So, at least one qualified assistant should be assigned to the staff in charge of grading labels for the overseas certified operators in accordance with the provision-V of the Technical Criteria for Certifying Importers of Organic Plants and Organic Processed Foods of Plant Origin.
2. Such assistant(s) (to the staff in charge of grading labels) should pay attention to the following “Key Considerations” when attaching the organic JAS seals:
  - (i) To attach the designated Organic JAS seals (designated by the relevant certified importers) only to those agricultural and forestry products consigned to the certified importer.
  - (ii) To report the number of Organic JAS seals (attached to the relevant products) to the certified importers (the relevant assignor) and keep a record.Such assistant(s) (to the staff in charge of grading labels) need to complete “the training course on grading label” to understand the above “key considerations”.
3. Such “training course on the grade labeling” shall be deemed to have been completed by providing the relevant assistant staff (to the staff in charge of grading labels) with the following “Key Considerations” by websites or e-mails, etc. and letting them understand the key points accordingly:

### Key things to consider when entrusting the task of affixing Organic JAS seals

Applicants for the “training course” specified in Clause-8 of “The Technical Criteria for Certifying Importers of Organic Plants and Organic Processed Foods of Plant Origin” will be deemed to have completed such training course, provided that they read the following thoroughly and understand well enough.

#### I Types of Agricultural Products to which Organic JAS seals can be affixed under the consignment agreement with the JAS certified importers

Those Agricultural Products that can be exported to Japan under the organic equivalency arrangement with Organic JAS (to which Organic JAS seals can be affixed under the consignment agreement with the JAS certified importers) are limited to Organic Products of Plant Origin, Organic Livestock Products and Organic Processed Foods including Organic Alcohol Beverages as shown below.

(Note: Scope of the products may vary depending on the country or region with which Japan has organic equivalency arrangement.

Please refer to:

[https://www.maff.go.jp/e/policies/standard/jas/specific/attach/pdf/Organic\\_equivalency-14.pdf](https://www.maff.go.jp/e/policies/standard/jas/specific/attach/pdf/Organic_equivalency-14.pdf) )

- (i) Organic Products of Plant Origin (including fungi)  
(e.g.): vegetables, fruits, grains, fresh coffee beans, sugar canes, fungi
- (ii) Organic Livestock Products (Excluding Honey) (e.g.): Beef, Eggs
- (iii) Organic Processed Foods (of plant origin and/or of livestock origin)  
(e.g.): processed vegetables, processed fruits, processed grains, coffee beans, sugar, ham, chocolate, cookie
- (iv) Organic Alcohol Beverages

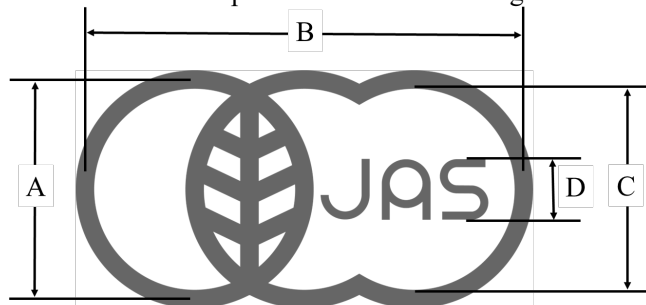
#### II Affixing of Organic JAS Seals to organic products

- (i) Appointment of a person in charge of affixing Organic JAS seal (logo)

When entrusting the task of affixing Organic JAS seals under the consignment agreement with the JAS certified importers, it is necessary to appoint a person in charge of affixing Organic JAS seals, who must understand the entrusted business details, such as types of organic products (to which Organic JAS seals should be affixed), format of Organic JAS seal, and how to write a report to JAS certified importers.

- (ii) Check the format of Organic JAS seal (logo)

As shown in the following Figure-1 (The format of Organic JAS Seal), the names of registered certification body, who certified the relevant certified importer, must also be displayed below this seal (logo). So, such format of Organic JAS seal (logo) designated by the relevant certified importer must be affixed. Figure-1: The format of the JAS Seal (logo)



Name of RCB

Code number of certified body

- (1) The length of A must be not less than 5 mm
  - (2) The length of B must be twice as long as the length of A, the length of D must be 3/10 (three-tenths) of the length of C
  - (3) The character height of “認証機関名” (Name of the Certification Body) must be the same as D
  - (4) Abbreviation may be used for (Name of the Certification Body).
  - (5) Certification Number may be omitted in the cases where such product type (organic products of plant origin, organic livestock products or organic processed foods) and operation type (production process managers, re-packers, overseas production process managers, overseas re-packers or importers) can be identified by the information described on the package, container or invoice of the relevant products (organic products of plant origin, organic livestock products or organic processed foods) in accordance with the provisions of the related laws and regulations.
  - (6) The color of the JAS seal (logo) is not specified.
- (Note:) In case such tasks of affixing Organic JAS seals(logos) were entrusted by multiple JAS certified importers, name of the relevant certification bodies displayed under Organic JAS seal (logo) may be different depending on each entrusting certified importer. So, it would be necessary to check every format of each Organic JAS Seal (logo) designated by each certified importer and affix the appropriate Organic JAS seal (logo) accordingly.

(iii) Reporting to the JAS certified importers, after affixing Organic JAS seals (logos)

In the cases where such Organic JAS seals (logos) are affixed to the organic products consigned to the JAS certified importers, it is necessary to prepare a report\* (refer to Figure-2 below) for each export lot, that contains the names of the relevant organic products and the affixing number and date of such Organic JAS seals (if possible, including lot numbers, weights, etc.), and provide it to the relevant certified importers

\*A duplicate copy of this report must also be retained. Such report (document) may be retained in digital or electronic form.

Just as a reference, please find below an example of Report Writing Format (Figure-2).

However, in the cases where the number of JAS seals (affixed to the products) is indicated on the relevant invoice or it may be stated in the invoice that the number of such JAS seals (affixed to the products) is the same as the quantity of the relevant organic products, it is not necessary to prepare such report separately.

Figure-2: Report Writing Format for JAS certified importers (Example)

To JAS certified importer					
Re: Number of JAS seals (affixed to products)					
Invoice No. : ABCD-123					
Commodity Name	Lot Number	Organic Products		JAS seals (Logos)	
		Quantity	Weight	Number of seals affixed to the products	Date of affixing the JAS seals
Organic Raisin	abc-123	1,000cs	20,000kg	1,000	April 1st, 2013
Soybean	def-456	200bags	6,000kg	200	April 2nd, 2013
Tomato Juice	ghi-789	100cs	240kg	1,200	April 3rd, 2013
Notes) If there are any additional information for the certified importers, please list them here.					
Date					
Signature of the person in charge of attaching JAS logos					

### III Supplemental

It is permissible to affix such foreign country's certification logos etc. to the relevant organic products as well, in addition to the Organic JAS seals (logos).



**(Q5-13) With reference to the Article 12-(2) of Act on Japanese Agriculture Standards, may we understand that such certification bodies “recognized as equivalent to the foreign governmental organizations (by MAFF)” are able to issue certificates (for the products exported to Japan) only to the certified operators in their own countries?**

(A5-13)

In principle, such certification bodies recognized as equivalent to the foreign governmental organizations (by MAFF), (hereinafter referred to as “quasi-governmental organizations”) can issue certificates (for agricultural and forestry products exported to Japan) only to certified operators in their own countries. However, quasi-governmental organizations in EU can issue certificates for such agricultural and forestry products (exported to Japan) not only to the certified operators in their own countries but also to those certified operators in EU member countries.

A list of accredited institutions who can issue certificates is available on the following website of Ministry of Agriculture, Forestry and Fisheries.

(List of Certification Bodies etc. in the EU) [https://www.maff.go.jp/j/jas/jas\\_kikaku/attach/pdf/yuuki-328.pdf](https://www.maff.go.jp/j/jas/jas_kikaku/attach/pdf/yuuki-328.pdf)

(Organic JAS): [https://www.maff.go.jp/e/policies/standard/specific/organic\\_JAS.html](https://www.maff.go.jp/e/policies/standard/specific/organic_JAS.html)

**(Q5-14) In the cases where an importer in Japan is to import the organic JAS certified products affixed with the organic JAS logos by the relevant overseas certified operator, does such importer need to get certified?**

(A5-14)

No, importers do not need to be certified in such a case, since the organic JAS seals are already affixed to the relevant food products, that have been certified and affixed with the organic JAS seals by the overseas certified operators, while in case the importers are to import the certified products (certified under the relevant equivalency country’s organic system) under the organic equivalency arrangement and label the products as organic, such importers need to obtain organic JAS certification and affix organic JAS seals to the products accordingly.

#### **IV Japanese Agricultural Standards**

**(Q6-1) Please explain the details of the organic labelling regulations.**

(A6-1)

According to the organic labeling regulations, in cases where the Organic JAS seals are not attached to the products by the certified operators, such products (such as the plant products, livestock products and the processed foods produced thereof) are not permitted to be labelled as organic products of plant origin, organic livestock products and organic processed foods (organic processed foods of plant origin, organic livestock processed foods, or organic foods of both plant and livestock origin), or labeled with misleading or confusing descriptions.

Such Imported products (such as the plant products, livestock products and the processed foods produced thereof) labeled as organic products of plant origin, organic livestock products and organic processed foods (organic processed foods of plant origin, organic livestock processed foods, or organic foods of both plant and livestock origin), or labelled with any misleading descriptions shall not be sold, consigned for sale or displayed for sale by the importers without Organic JAS seals.

**(Q6-2) What kind of substances are allowed for use under the organic JAS?**

(A6-2)

According to the Codex “Guidelines for the Production, Processing, Labelling and Marketing of Organically Produced Foods” (Hereinafter referred to as “Codex Guidelines”), certain substances, based on the realities and circumstances of each country, may be added to the permitted substances listed in the Codex Guidelines, if they satisfy the certain criteria such as “its use is necessary/essential for its intended use” or “they have the lowest negative impact on human or animal health” or “its use does not result in or

contribute to harmful effects on environment”.

In accordance with the criteria of Codex Guidelines, we shall consider whether any additional substances could be allowed for use under the organic JAS in the following points, when we receive a petition to add any substances, (which satisfy the relevant provisions specified in the Agricultural Chemicals Regulation Act and the Food Sanitation Act), to the JAS permitted substance list.

- 1) To be added, if found listed in the permitted substances of Codex Guidelines
- 2) To be added, if assessed as satisfying the above criteria in case such substances are not listed in the permitted substances of Codex Guidelines.

**(Q6-3) With reference to Article 12-(2) of Act on JAS, which specifies as “those that have an equivalent grading system.....”, how do you determine and publicize such equivalent countries?**

(A6-3)

” Those countries, having the equivalent grading systems, are determined by the Ministry of Agriculture, Forestry and Fisheries (MAFF) and the Ministry of Finance through their individual equivalency evaluations upon the request of each country and publicly announced by the Ordinance of Competent Ministry accordingly. (Such publicly announced foreign countries are found on the official websites of MAFF.)

On the other hand, “equivalency” does not ensure that the organic grading system of such equivalent countries would be exactly the same as the Organic JAS system, but it ensures the same operations or treatments as those under the JAS system despite the difference between the JAS system and the international standards, by making agreement between Japan and the relevant countries for such equivalency arrangements.

**(Q6-4) As “issuance of export certificates” shall be included in the certification operations of accredited certification bodies from April 1<sup>st</sup>, 2022, (as specified in the Article 46 of the Regulation for Enforcement of the Act on JAS), what actions should certification bodies take specifically?**

(A6-4)

Accredited certification bodies, who issue export certificates under the equivalency recognition between the JAS system and the relevant foreign countries’ systems, need to set out the followings in their business operation policies in accordance with the Article 52-(3)-(iv)(v)(vii) of the Regulation for Enforcement of the Act on JAS, enforce them by April 1<sup>st</sup> 2022 and notify such changes (※3) in their business operation policies to the Minister of Agriculture, Forestry and Fisheries via FAMIC before their entry into force.

- 1) The way they conduct assessment when they issue the export certificates (including the destination countries for export (※1) to which their certificates are issued, types of agriculture and forestry products and the application & issuance procedures)
- 2) Methods for calculating fees
- 3) Items related to the responsibilities and required abilities (※2) of the staff engaged in the certificate issuance activities

※1 : Must be the certificate issuing bodies accredited in the relevant exporting countries, which can be confirmed in the following website of Ministry of Agriculture, Forestry and Fisheries.

[https://www.maff.go.jp/j/jas/jas\\_kikaku/youki-136.pdf](https://www.maff.go.jp/j/jas/jas_kikaku/youki-136.pdf)

※2 : (e.g.) “Certificate issuance activities” to be included in the responsibility of the certification staff and “Necessary knowledge required for the certificate issuance activities” to be included in the criteria of the required abilities, etc.

※3 : They need to notify only the changes in their basic scheme policies for the implementation methods of certification activities. Also, they need to manage the staff engaged in the certificate issuance activities in accordance with Article 6 of ISO/IEC 17065 and carry out the following activities in association with the issuance of export certificates:

- a) Before they issue the export certificates, they need to check (※5) if the certified operators’ products (which are scheduled for export) (※4), satisfy the equivalency requirements for the destination countries and record their confirmation results.

※4 : Examples of information to be confirmed for the certified operators’ products, which are scheduled for export

- Exporters

- Export Countries of Destination
- Whether or not the relevant products are subject to grading
- Whether or not the relevant products have been produced in Japan  
(Those products for U.S. or Canada: Whether or not ①Produced in Japan or ②Final Processing or Packaging & Labeling occurred Japan)
- Country of Origin of raw materials (limited only to the products for EU, Switzerland and the UK)
- Labeling details (only in the cases where the destination countries' logos or the CB names are to be displayed on the labels in accordance with the destination countries' standards)

※5 : To check the requirements (scope etc.) on the following MAFF Website:

[https://www.maff.go.jp/j/jas/jas\\_kikaku/youki.html#dotosei](https://www.maff.go.jp/j/jas/jas_kikaku/youki.html#dotosei)

- Every time the certified operators export their products, accredited certification bodies need to verify the products (which have been confirmed by the above a)) by the relevant documents (such as invoices, packing lists etc.), which have been obtained from the certified operators to confirm the information on the consignment, and record their confirmation results.
- If there's not any problems after the above confirmation b), they may issue export certificates accordingly. (※6)

※6 : They need to check the relevant shipping documents such as Bill of Lading (B/L), depending on the destination countries' requirements, after issuing the export certificates.

- At their annual audits, they shall check if there's any problem with the export products related performance mentioned in the above a) and record their confirmation results.

On the other hand, accredited certification bodies need to summarize the export certificate issuance record of the previous year and report it to the Minister of Agriculture, Forestry and Fisheries via FAMIC by the end of January every year.

(which shall be mandatory from the reporting for FY2023)

**(Q6-5) Regarding the amendment to the Act on JAS in 2022, what is the reason why the certification should be required for the foreign grade labeling?**

(A6-5)

Because the reliability of foreign grade labeling in Japan under the organic equivalency arrangement could hardly be assured before, as there were no provisions for such labeling available under the Act on JAS before this amendment.

This is based on the view that we need to establish a mechanism to control foreign grade labeling adequately, because our counterpart countries and regions may lose confidence in Japan, which poses a challenge to our further equivalency negotiations, should any irregularities of such foreign grade labeled products be found or exposed frequently overseas, whereas the increasing number of products are labeled as “made in Japan” and exported under the equivalency arrangement.

This is the reason why we established a system under the amended Act on JAS in 2022, in which JAS certification should be required for the foreign grade labeling.

**(Q6-6) Please explain what “foreign grade labeling” means.**

(A6-6)

“Foreign grade labeling” indicates that the relevant product has been graded under the grading system of the specific foreign countries or regions, with which Japan has organic equivalency arrangement, and it refers to the labeling with the organic seals/logos provided under the grading system of the U.S., Canada and the EU specifically, as specified in Article 34 of Act on JAS.

On the other hand, those requirements (other than organic logos/seals) to label the products for export to the U.S., such as “Certified organic by XX” etc., do not apply to the foreign grade labeling.

**(Q6-7) In what circumstances, should the foreign grade labeling operators obtain certification?**

**Please also clarify:**

- 1) Isn't it necessary for the operators who export their products under the organic equivalency arrangement to obtain certification for the foreign grade labeling operators, if they don't affix foreign grade certification labels (based on the relevant foreign grade certification system) to their products?**
- 2) Is it necessary to obtain such certification for the foreign grade labeling operators even in the cases where the foreign grade labels are not affixed to the relevant agricultural and forestry products or their packages/containers but are affixed only to their invoices?**

**(A6-7)**

In the cases where the JAS certified agricultural & forestry products are to be exported under the organic equivalency arrangement, should such operators also affix foreign grade labels to the relevant products or their packages or invoices, they need to obtain organic JAS certification for foreign grade labeling operators.

- 1) Even in the cases where the operators are to export their products under the organic equivalency arrangement, if they don't affix foreign grade certification labels to their export products, they don't need to obtain organic JAS certification for foreign grade labeling operators.
- 2) In the case where the operators are to affix foreign grade labels only to the invoices (for the products), they need to obtain organic JAS certification for foreign grade labeling operators.

**(Q6-8) In the cases where the certified organic production process managers are to obtain the certification for the foreign grade labeling operators and affix the relevant foreign grade labels to their own agricultural and forestry products (produced by their in-house manufacturing), is it possible for the relevant production process managers to skip the process of affixing JAS seals?**

**(A6-8)**

No, the relevant certified production process managers are not allowed to skip the process of affixing JAS seals even in the cases where they obtain the certification for foreign grade labeling operators and affix the relevant foreign grade labels to their self-produced agricultural and forestry products, because such foreign grade labeling is allowed only for the JAS certified products affixed with the JAS seals, (as specified in Article 12-(2)-(1).) Besides, such organic JAS seals are not necessarily affixed to the relevant products or their packages or containers, but JAS seals can be affixed only to the invoice of the products.

**(Q6-9) In the cases where the certified organic production process managers are to obtain the certification for the foreign grade labeling operators and affix the relevant foreign grade labels to their own agricultural and forestry products (produced by their in-house manufacturing), do the relevant production process managers have to affix JAS seals to their agricultural and forestry products before affixing the foreign grade labels?**

**(A6-9)**

Such certified production process managers (who also obtained certification for foreign grade labeling operators) are allowed to affix foreign grade labels to their self-produced agricultural & forestry products or their packages, containers, or invoices in advance before they affix organic JAS seals as certified production process managers, (as specified in Article 12-(2)-(2).) But, even in such cases, such certified production process managers must affix organic JAS seals to the relevant products, their packages, containers, or invoices, before selling out or selling on consignment, (as specified in Article 12-(2)-(3).)

**(Q6-10) In the cases where the trading companies etc. are to purchase the organic certified products attached with JAS seals from the certified production process managers, affix the foreign grade labels to the invoices of the relevant products and export the relevant products to the organic equivalency countries, is it possible for the relevant trading companies etc. to export the relevant products direct from the place where the relevant production process managers are located, without going through any other receiving and storage facilities?**

**(A6-10)**

Provided that the storage facilities used by the relevant production process managers for export products satisfy the requirements for "the receiving and storage facilities for the export products" specified in the "Technical Criteria for foreign grade labeling operators", it's possible for them to export the products

directly from the relevant storage facilities.

However, in that case, such receiving & storage facilities used by the relevant production process managers for export products must be included in the scope of certification for the relevant trading companies etc., as “the receiving and storage facilities for the export products” (specified in the “Technical Criteria for foreign grade labeling operators”), and the relevant trading companies etc. need to verify the grade labeling of the export products and store such products properly at the relevant facilities.

**(Q6-11) In the cases where the operators are to export their organic products of plant origin under the organic equivalency arrangement, does the relevant operator have to attach the export certificate to their products, even if they are certified as foreign grade labeling operators?**

(A6-11)

As the export certificates must be attached (as requested by the counterpart countries or regions) in case the organic JAS certified plant products are exported under the organic equivalency arrangement, even the JAS certified foreign grade labeling operators need to attach the export certificates to their organic plant products, which are to be exported under the organic equivalency arrangement.

**(Q6-12) Is it possible for the certified foreign grade labeling operators to distribute the foreign grade labeled products in Japan?**

(A6-12)

No, even the certified foreign grade labeling operators are not allowed to distribute the foreign grade labeled products in Japan, because foreign grade labeling on the agricultural & forestry goods is not allowed, except for the following cases:

- 1) In the cases where JAS certified foreign grade labeling operators may affix foreign grade labels to the relevant export organic products.
- 2) In the cases where such operators are certified to the organic grading standards of the relevant foreign countries.

Please note that such foreign grade certified operators are allowed to distribute such foreign grade labeled products (that are graded and labeled in accordance with the organic standards of the relevant foreign countries) in Japan, (as specified in Article 37-(1) of Act on JAS).

**(Q6-13) Should the certified importers remove/delete the foreign grade labels (affixed by the certified operators under the equivalency countries’ grading system) after importing such products to Japan?**

(A6-13)

No, certified importers do not need to remove/delete the foreign grade labels (that were affixed by the certified operators under the relevant equivalency countries’ organic grading system, before their import), because such foreign grade labels were affixed by the foreign operators and there are no provisions for the removal/deletion of such foreign grade labels under Act on JAS (amended in 2022).

**(Q6-14) In the cases where the certified importers entrust the duty of affixing JAS seals to the certified operators under the equivalency countries’ grading system, is it possible to import such products attached with both JAS seals and foreign grade labels?**

(A6-14)

There should be no problem if the organic JAS certified importers import such products attached with both JAS seals and foreign grade labels, in the cases where they entrust the duty of affixing JAS seals to the certified operators under the equivalency countries’ grading system, since such foreign grade labels were affixed by the foreign operators and there are no provisions for the removal/deletion of such foreign grade labels under Act on JAS (amended in 2022).

**(Q6-15) Is it possible for the certified importers to affix “such labels displaying both foreign grade logos and organic JAS seals side by side (which are confirmed by the certification bodies under the equivalency countries’ organic grading system)” to the relevant agricultural and forestry products in Japan for the distribution in Japan?**

(A6-15)

No, organic JAS certified importers are not allowed to affix “such labels displaying both foreign grade logos and organic JAS seals side by side” to the relevant agricultural and forestry products in Japan for the

distribution in Japan, (as specified in Article 37-(1) of Act on JAS), even in the cases where such labels are confirmed by the certification bodies under the equivalency countries' organic grading system, because foreign grade labeling on the agricultural & forestry goods is not allowed, except for the following cases:

- 1) In the cases where JAS certified foreign grade labeling operators may affix foreign grade labels to the relevant export organic products.
- 2) In the cases where such operators are certified to the organic grading standards of the relevant foreign countries.

**(Q6-16) Even in the cases where there's a possibility that the same products could be exported under the equivalency or distributed in the Japanese domestic market, isn't it possible to affix such joint labels as displaying both foreign grade and JAS logos to the same products and distribute them in the Japanese domestic market?**

(A6-16)

No, it's not permissible to affix such joint labels as displaying both foreign grade and JAS seals to the same products and distribute them in the Japanese domestic market, even in the cases where there's a possibility that the same products could be exported under the equivalency or distributed in the Japanese domestic market, because foreign grade labeling on the agricultural & forestry goods is not allowed, except for the cases where

JAS certified foreign grade labeling operators may affix foreign grade labels to the relevant export organic products or such operators are certified to the organic grading standards of the relevant foreign countries. On the other hand, it is permissible for those operators certified under the relevant foreign country's grading system to distribute such foreign country's certified organic products affixed with foreign grade labels in the Japanese market. (as per Article 37-(1) of Act on JAS)

### **(Regarding Clause 3)**

**(Q7-1) Regarding the "other substances applied to soil, plants or mushrooms" specified in 3.4 (Prohibited Substances) of JAS for Organic Plants, what exactly are those substances?**

(A7-1)

1. The following provision was added to 3.4 (Prohibited Substances) of JAS for Organic Plants at the revision of 2005  
"Other materials or substances that are used for the plants or soils" (except for natural substances or substances derived from natural substances that have not undergone chemical treatment).
2. Even before this revision those materials or substances (except for fertilizers and agricultural chemicals), to which chemo-synthesized substances are added, had been prohibited for use in the organic cultivation as a matter of course, as they may contaminate the organic plants or organic fields when they are applied to or in contact with the plants or soils. In this regard we have revised this provision to make it clear to all the parties concerned including certification bodies etc.
3. Those other materials or substances, which are prohibited for use if chemically synthesized substances are contained, would include 1) seed tapes, chain pots and mulches, that are assumed to be plowed into the soil while they are in use, 2) pollen extenders that are directly applied to plants, and 3) snow-melting agents that are sprayed directly on the fields.
4. However, those materials that are to be removed after use, such as plastic mulches, and plastics, poles, nets and binding tape (that are used for the PVC greenhouses), do not fall into the prohibited substance categories.

**(Q7-2) Does this standard apply to those plant products that are grown hydroponically or grown in rockwool cubes or small pots?**

(A7-2)

Plant products cultivated by hydroponic and rockwool cultures do not comply with the Organic JAS, because the principles of organic plants production are set out as "maximize the farmland productivity derived from the nature of the soils" under the JAS for Organic Plants.

Accordingly, those products are not allowed to carry Organic JAS seals, and they cannot be labeled as organic plant products, because they fall under the category of designated agricultural and forestry products. However, pot cultivation may comply with the JAS standards provided that the soil obtained

from the certified field is used and that such pot cultivation takes place in the certified farming fields.

**(Q7-3) Does this standard apply to *Wasabi* cultivated in flat gravel beds?**

(A7-3)

*Wasabis* cultivated in gravel culture shall not be included in the organic plants, because they are cultivated in such a way that the roots are fixed to the gravels without soils, which is not in conformity with the principles of organic plants production set out as “maximize the farmland productivity derived from the nature of the soils” under the JAS for Organic Plants. Therefore, those *wasabis* shall not carry Organic JAS seals nor be labeled as organic. On the other hand, *Wasabis* harvested in fields are subject to the Organic JAS.

**(Q7-4) It seems that the JAS for Organic Products of Plant Origin may not apply to manufactured or processed plant products. We wonder how you define the activities associated with manufacturing or processing in the production process. Would polishing rice be included in the definition of processing?**

(A7-4)

We shall determine whether a product in question has been “manufactured or processed” in the production process, based on the conventional wisdom, considering the specific production circumstances such as specific work done on the relevant plant products. (To be more specific, “manufacturing” is defined as the creation of new products, which are fundamentally different from their raw materials, while “processing” is defined as addition of new attributes while preserving the essence of the raw materials.)

If we take a look at some examples based on the concept of processing, you will find that heating, flavoring, grinding, juice extraction and salting would be considered as processing, whereas simple cutting, transport and food drying would not be considered as processing.

However, please note that dried strips of radish, dried persimmons, dried sweet potatoes and herbal tea (dried herb) are considered as processed foods, in accordance with the Appendix-1 of Food Labeling Act (Cabinet Office Order No.10 of March 20, 2015), while polished rice is subject to the JAS for Organic Products of Plant Origin, as specified in the Appendix-2 of the above Food Labeling Act, since the polishing process is not considered as processing.

**(Q7-5) In case a farmer processes self-produced organic plants and sells the processed products as organic processed foods, is it necessary for such farmer to obtain the certificate for production process manager of organic processed foods as well, in addition to the certificate for production process manager of the organic plants?**

(A7-5)

Yes, it is necessary for such farmer to be certified as a production process manager of the organic processed foods as well as the organic products of plant origin.

**(Q7-6) In the cases where green tea leaves may be graded as crude green tea by the production process managers of organic plants or rice bran may be labelled as organic by the production process managers or re-packers of organic products of plant origin, is it necessary for such production process managers or re-packers to obtain the certification for the organic processed foods as well?**

(A7-6)

1. As the fresh green tea leaves produced by the farmers, in general, must be immediately heat-treated to prevent the discoloration (caused by the enzymatic reactions) to prepare for the crude green tea, such heat-treatment shall be considered as a preparation process for the green tea leaves. So, certified production process managers of organic products of plant origin are permitted to label such heat-treated crude green tea leaves as organic in accordance with the JAS for Organic Products of Plant Origin and ship them to the operators who process such leaves.

However, in cases where 1) the farmers are to label their prepared crude green tea as organic in order to sell them directly to the consumers or 2) they are to purchase fresh green tea leaves from the other farmers rather than producing them by themselves, produce crude green tea leaves and label them as organic, they need to become certified production process managers of organic processed foods in order to label their products as organic in accordance with the JAS for organic processed foods.

On the other hand, when it comes to black tea, even in the cases where the farmers ferment the black tea leaves (harvested by them) by themselves, they need to become certified production process managers for organic processed foods.

2. As the rice bran is generated as a byproduct of rice milling process or preparation process for the milled rice, production process managers for the organic products of plant origin who produced the relevant rice bran, or re-packers are able to label the products as organic in accordance with the JAS for Organic Products of Plant Origin. Since rice bran falls under the category of processed food, it needs to be labeled for sale in accordance with Food Labeling Act (Cabinet Office Order No.10 of March 20, 2015)

**(Related to Clause 4)**

**(Q8-1) Regarding the “natural cyclical function of agriculture” specified in 4-a) of JAS for Organic Products of Plant Origin, what does this mean?**

(A8-1)

That means “the function of agricultural production activities that depends on the circulation of substances mediated by living things in nature and promotes it”, according to the Article 4 of Food, Agriculture and Rural Areas Basic Act (Act No.106 of July 16, 1999).

**(Q8-2) Please explain why fungi are included in the JAS for Organic Products of Plant Origin?**

(A8-2)

Mushrooms etc. were added to our standards in the 2006 revision, at the request of both producers and consumers, who insisted that wood-decay fungus mushrooms (such as the Japanese most popular Shiitake mushrooms) should be included in our standards under the following circumstances:

Since there were not any mushrooms standards available, which could be used to demonstrate that their products were produced by unique production techniques,

- a) Producers found it difficult to ensure credibility of the labels that show the added value in the products.
- b) Consumers found it difficult to select the added value products.

**(Q8-3) With reference to 3.8 (Collecting/harvesting area) of JAS for Organic Products of Plant Origin, please let us know what kind of plants are collected/harvested in collection areas.**

(A8-3)

Those organic plants, which grow in the fallow fields or ridges, would include edible wild plants, mushrooms, and raspberries, etc. Cultivated and managed mountains or forest lands etc. would fall under the fields category rather than collection areas category.

**(Q8-4) With reference to 3.8 (Collecting/harvesting area) of JAS for Organic Products of Plant Origin, why wild plants or naturally grown plants should be included here?**

(A8-4)

Because there always are market needs for the naturally growing plants, which could be differentiated as organic, distributed to the market for consumption, if it's confirmed that they are not affected by any pesticide drifts, while they could be affected by the pesticide drift of sprays.

**(Q8-5) With reference to the “sprouts” specified in 4-a) of JAS for Organic Products of Plant Origin, for which the production methods criteria have been newly provided by the amendment to this standard in December,2015, what kind of plants are included in this category.**

(A8-5)

1. Such “sprouts”, for which the productions methods criteria were specified in the revised standards (revised in December 2015), would mean those produced without giving nutrients (such as liquid fertilizers) to the seeds but using only water, (limited to those grown in the cultivation sites excluding fields)
2. The following plant products do not fall under the sprouts specified in the Japanese Agricultural Standard for Organic Plants:
  - a) Just like what is called “Baby Leaf”, those plants produced by giving some nutrients (such liquid



fertilizers) as well as water

b) Garlic Sprouts or Ginger roots for example, those plants that are not produced from the seeds.

c) Sprouted brown rice or sprouted garlic, which may be sprouting, however, not only sprouts but also the brown rice or garlic in themselves are entirely edible.

Please note that those plants could be graded as organic plants, if they are in conformity with the Japanese Agricultural Standard for Organic Plants

3. Those sprouts grown in the fields, as always, may be graded as organic plants. (Please refer to (Q10-4))

**(Related to Clause 5 “Fields, Cultivation sites”)**

**(Q9-1) With reference to the requirements for the fields, at what point in time should such organic management be deemed to have started?**

(A9-1)

1. Organic production management for perennial plants can be deemed to have started at the time of discontinuing the use of prohibited substances-
2. Organic production management for plants other than perennial plants can be deemed to have started at the time of discontinuing the use of prohibited substances, provided that no crop is cultivated <sup>erops</sup> in the fields at that point. However, should any crops be cultivated in the fields at the time of discontinuing the use of prohibited substances, organic production management for such plants should be deemed to have started at the time of harvesting (or reaping) such crops, since such crops would not be considered to have been under the organic management.

**(Q9-2) Regarding “the newly developed fields or fields which have not been used for cultivation”, at what point in time should such plants production be deemed to have started?**

(A9-2)

When those cultivation works, such as mowing, plowing, composting, seeding, or planting of crops, or sowing green manures, etc. are carried out first, and in case such works turns out to be leading to the planting of the organically managed crops, the production of plants can be deemed to have started. However, if such crops were not planted after such mowing or plowing works, such production of plants should be deemed to have started at a point in time when the mowing or plowing was carried out.

**(Q9-3) Is it possible to repeat the organic farming and conventional farming alternately in the same fields?**

(A9-3)

Conversion from conventional to organic farming is based on the premise that organic farming should be continued after the conversion. As specified in the Annex 1-A-4 of the Guidelines for the Production, Processing, Labeling and Marketing of Organically Produced Foods (hereinafter referred to as “*the Codex Guidelines*”), areas in conversion as well as areas converted to organic production must not be alternated between organic and conventional production methods, except in the case where the accredited certification bodies determined such alternation as a temporary measure due to the unavoidable circumstances such as natural disasters or farmland consolidation, etc.

**(Q9-4) With reference to the provision 5.11 of JAS for Organic Products of Plant Origin, which stipulates that “... must be those fields, where the necessary measures have been taken to prevent the drift or runoff of prohibited substances from surrounding areas into the fields”, how should we make such decisions specifically?**

(A9-4)

It’s necessary to take steps to compartmentalize the fields, with the aim of preventing prohibited substances from drifting and flowing from the surrounding areas. Such specific decision shall be made by the certification bodies, as the specific measures may vary depending on the individual situation of a field. For example, the following points would be taken into consideration:

- a) distance for buffering organic fields from the conventional fields

- b) compartmentalization of the fields by roads etc.
- c) installation of windbreak nets
- d) improvement of buffer zones by cultivating crops at the boundary zone
- e) development of ridge or furrow to prevent rainwater inflow from the conventional fields during rainfall, and so on

**(Q9-5) How should we deal with the designated areas for aerial pesticide application?**

(A9-5)

You need to request the responsible institutions or agencies authorized to conduct aerial spraying of pesticides, that your fields be excluded from the designated target area for the aerial pesticide application, while you also need to take the necessary measures to prevent the spray drift of aerial pesticide application.

**(Q9-6) How can you verify the effectiveness of such measures to prevent pesticide spray drift from the designated areas for aerial pesticide application?**

(A9-6)

In this regard, the certification bodies shall make a judgement, in consideration of the following, as the aerial pesticide spray could be conducted in the peripheral areas nonetheless, even if the relevant field were excluded from the target area of aerial pesticide application.

- a) Whether or not proper measures are taken to prevent pesticide spray drift under the specific conditions, such as geographical features or wind direction
- b) How aerial pesticide spraying is made, and so on

**(Q9-7) With reference to 5.2.1 of JAS for Organic Products of Plant Origin, which stipulates that “necessary measures to prevent the prohibited substances from drifting and flowing from surrounding area”, or especially “the measures to prevent the prohibited substances from drifting or flowing into the irrigation channels”, what does this mean specifically? Would you be more specific?**

(A9-7)

In cases where the sources of water for irrigation are rivers/irrigation canals (excluding dual-purpose drainage ditches/channels), well water, marshes, etc., any measures to prevent contamination from the prohibited materials or substances would not be required.

In case the water for irrigation is coming through the conventional fields, some measures should be taken to prevent prohibited materials or substances from drifting into the organic fields, i.e. holding such water temporarily in the paddy fields for purification before drifting into the organic fields.

**(Q9-8) With reference to the “plant products harvested from perennial plants” specified in 5.1.2 – a), what kinds of crops are those specifically? Would you be more specific?**

(A9-8)

“Perennial plants” mean those perennial crops (such as fruit trees, tea plants and asparagus) that grow and flower repeatedly over a long time, as all or part of their rootstocks do not die and survive after flowering and fruiting.

**(Q9-9) Regarding the provision 5.1.2 – a), which stipulates that “in case of newly developed fields or fields which have not been used for cultivation, and in which prohibited substances have not been used for no less than two years”, please let us know why such conversion period should be reduced in such case.**

(A9-9)

Because, in the cases where prohibited substances have not been used for two years or more in the newly developed fields that have not been used for cultivation and cultivation management etc. are carried out there for 12 months or more after that in accordance with the organic production standards, it can be considered that the prohibited substances would have been used for 3 years or more in total.

**(Q9-10) How should we handle the crops produced from the organic farming fields that are affected by the pesticide drift from other agricultural fields where agricultural chemicals are applied?**

(A9-10)

While the impacts of spray drift and runoff from the aerial pesticide application may be different depending on the geographical features of the relevant fields, regional climate conditions, etc., should the relevant fields be confirmed to be affected by the drift or runoff of any pesticides other than those specified in Annex B-Table B.1 of the JAS for Organic Products of Plant Origin, such plant products produced in the relevant fields shall not be considered as organic.

**(Related to Clause 5 “Seeds or seedlings to be used in fields”)**

**(Q10-1) Regarding the “budwood, rootstock...” specified in 3.9 of JAS for Organic Products of Plant Origin, what does this mean specifically? Would you be more specific?**

(A10-1)

Budwood is a bud that is grafted to the stalk during the grafting process, while rootstock is a rooted plant.

**(Q10-2) With reference to 3.9 of JAS for Organic Products of Plant Origin, which stipulates that “Part of or all of plant body...”, what does “part of” mean specifically? Would you be more specific?**

(A10-2)

Such parts include stems, seed tubers, etc. of aroids and sweet potatoes.

**(Q10-3) With reference to 5.4.3 of JAS for Organic Products of Plant Origin, which stipulates that “...it is permissible to use seeds for seed-propagating varieties and youngest seedlings etc. for nutrient-propagating varieties...”, what kind of plants are included in such species? What does the “youngest available seedlings” mean? Would you be more specific?**

(A10-3)

1. Seed propagation species mean those plants are plants that can be propagated from seeds, excluding those that are generally propagated via stem cuttings (due to the fact that they may lose the important characteristics as plant products if propagated from seeds).  
Examples include the followings; grains such as rice, wheat, etc., most of leaf vegetables such as spinach, tomatoes, and fruit vegetables (excluding strawberries).
2. Vegetative propagation species are those plants that cannot be propagated from seeds, and those that are generally propagated via stem as they may lose their essential characteristics as plant products if propagated from seeds. Examples include fruit trees, root tubers, tea trees, etc.
3. In the case of vegetative propagation species, if it is difficult to obtain organic seedlings etc. or those that are free from any use of prohibited substances, you may use only the youngest seedlings etc. available in the market. Such youngest seedlings etc. include the seed tubers of konjac plants or scions from the parent fruit trees for example, and the youngest seedlings available. (However, in the case of using the seedlings of fruit trees, only those fruits, that have been nurtured in the fields during the first year after planting and harvested in subsequent years, can be graded as Organic JAS.)  
Organic seeds and seedlings must be used for the cultivation of organic plants, and even in the cases where such organic seeds and seedlings are not available, total cultivation time under the organic management should be extended as long as possible by using such youngest seedlings.

**(Q10-4) What do “edible sprouts” mean? Would you be more specific?**

(A10-4)

1. In case edible sprouts are to be produced by organic farming, organic grading could not be conducted if organically grown seeds are not used for such production, since the provision for “in case of difficulty to obtain organic seeds” specified in Article 3 (Seeds or seedlings to be used in fields) of JAS for Organic Plants shall not apply.
2. Such “edible sprouts” mean the plant products produced only by the production capacity of the seeds or seedlings, without relying on the productivity of the organic fields.  
More specifically, examples would include those sprouts (limited only to soil-grown sprouts) such as white radish sprouts, pea sprouts and soybean sprouts, etc., which are produced by the innate production (germination) capacity of the seeds, or those sprouts or shoots such as Aralia Sprout and

tea sprouts etc., which are produced by the innate production capacity of the seedlings or scions. (However, only in the cases where such edible sprouts are to be produced during the planting year, provided that the planted sprouts were nurtured in the organic fields in the first year and harvested from next year onwards, it would be possible to use the seeds or seedlings specified in the Article 4 of JAS for organic plants for such sprouts production and conduct organic grading for the harvested sprouts products accordingly.)

**(Q10-5) Please let us know what kind of seeds or seedlings we may use in the fields.**

(A10-5)

1. For the organic plants production, the seeds or seedlings that are produced in accordance with the Clause-5 of JAS for organic products of plant origin, should be used in principle. Even those seeds or seedlings, that are not produced in the certified organic fields, may be used, if it is confirmed that they satisfy the same standards.

2. In cases where it is difficult to obtain the seeds and seedlings mentioned in the above 1., or in the cases where it is necessary for the maintenance and regeneration of certain species, any other seeds and seedlings that have not been treated with prohibited substances may be used.

Such seeds and seedlings that have not been treated with prohibited substances refer to those seeds that have not been treated with prohibited substances for disinfection or coating treatment after harvest, or those being picked. In the case of seedlings, that have not been raised by using the prohibited substances in their growth phase. Notwithstanding the above, only in the cases where it's still difficult to obtain the seeds and seedlings in accordance with the above 1. and 2., conventionally grown seeds may be used for seed-propagating varieties and the youngest available conventionally grown seedlings may be used for vegetative-propagative varieties. This is because we should minimize the period of time during which organic control is not in place even in cases where conventional seeds and seedlings are used under unavoidable circumstances.

Additionally, it is stipulated that “(those) synthetic fertilizers and pesticides that show sustained efficacy in fields after the sowing or planting, should not be used.”

Specifically, this refers to the seeds and seedlings for which such substances or materials are used, where chemical fertilizers etc. are covered with a coating film so as to adjust elution time and amount of the fertilizer components. Should such seeds or seedlings (for which such materials are used) be planted, such chemical fertilizers would continue to have a negative impact on the fields for a long period of time, which would not be in conformity with the production principle of organic plants. For this reason, such seeds and seedlings have been restricted under the 2012 revision to the JAS for Organic Products of Plant Origin. Please note that common seeds disinfection does not fall into the category of the agricultural chemicals that would have a sustained impact on the fields after sowing or planting.

3. In cases where it is difficult to obtain seedlings etc. in accordance with the above 3. and there are no seedlings, etc. available to plant due to natural disasters, pests, diseases, etc., or no seeds supply conventional seedlings may be used for seed-propagating varieties and seedlings other than the youngest ones may be used for vegetative-propagating varieties.

In cases where the operators could not produce seedlings from their self-cultivated seedlings due to the pests and diseases, or where the operator failed to raise the seedlings and may miss the opportunity should they start all over again, they may also use the conventional seedlings. Even in such cases, synthetic fertilizers and pesticides that show sustained efficacy in fields after the sowing or planting, should not be used.

4. Regarding the fruits and vegetables of Solanaceae and Cucurbitaceae families, in cases where raising seedlings is difficult, conventional seedlings for which chemically synthesized fertilizers or agricultural chemicals that show sustained efficacy in fields after planting, are not used, may be used for a certain period of time as a transitional measure under the Supplementary Provisions.

In the case of konjac potatoes, given that it might be difficult to plant and grow seed potatoes organically, other ways to plant konjac potatoes (other than growing seed potatoes) are also permitted for the time being.

**(Q10-6) With reference to 5.4.3 of JAS for Organic Products of Plant Origin, which stipulates that “In the cases where it is difficult to obtain ....”, what kind of situation does this mean specifically?**

(A10-6)

1. Such cases (where it's difficult to obtain) would refer to the situations where seeds or seedlings of the organic plants are in very short supply, or the price is too high.
2. However, these cases are permitted only in exceptional circumstances, which please note.  
As a general rule, seeds or seedlings produced in accordance with Article 4 of the JAS for Organic Plants should be used.

**(Q10-7) With reference to 5.4.2 of JAS for Organic Products of Plant Origin, which stipulates that “in the cases where there’s a necessity to maintain/renew the varieties”, what kind of situation does this mean specifically?**

(A10-7)

1. Such cases (necessary for maintenance and renewal of varieties) would refer to the situations where the operators may purchase and grow the seeds of the identical species/varieties on a regular basis to prevent the crop yield reduction or dispersion of species traits due to the repeated home seed-raising.
2. However, these cases are permitted only in exceptional circumstances, which please note.  
As a general rule, seeds or seedlings produced in accordance with Clause-5 of the JAS for Organic Products of Plant Origin should be used.

**(Q10-8) Regarding the organic seedlings available for sale in the market, how shall we verify whether they conform to the criteria specified in 5.4.1 of 5.4 (“Seeds or seedlings to be used in fields”) of JAS for Organic Products of Plant Origin?**

(A10-8)

You may use such seedlings available in the market, if you could confirm that those seedlings satisfy the criteria specified in 5.4.1, after checking the supporting documents for the relevant information on the soil used for raising seedlings and materials used in its raising process.

**(Q10-9) Regarding the agricultural materials, with which seeds may be encapsulated in a strip-shape, as specified in 5.4 of JAS for Organic Products of Plant Origin, please explain why such materials should be limited to those derived from cotton linter. Could any sheet-shaped materials be used rather than strip-shaped materials?**

(A10-9)

Regarding the agricultural materials, in which seeds may be encapsulated in a strip-shape, although there were three types of materials, poly-vinyl alcohol, cotton linters and wood pulp, we have decided to permit the use of only those made from the recycled fibers derived from cotton linters to which any synthetic chemical substances have not been added in the manufacturing process.  
Please note that such materials are limited only to the strip-shaped materials having the appropriate width to encapsulate the seeds. So, sheet-like materials, that could also be used as mulches, would not be applicable.

**(Q10-10) Is it permissible to use improved plant varieties produced by irradiation or seeds of such varieties derived therefrom under the JAS for Organic Products of Plant Origin?**

(A10-10)

As specified in 5.4.5 of JAS for Organic Products of Plant Origin, it is prohibited to use such seeds produced by using recombinant DNA technology.  
However, it should be OK to use those improved varieties (by irradiation) or those derived from them under JAS for Organic Products of Plant Origin, as breed improvement by using irradiation does not fall under the definition of the Recombinant DNA Technology specified in 3.6 of JAS for Organic Products of Plant Origin, which defines it as “Recombinant DNA technology that produces recombinant DNA molecules (which binds to DNA) by cutting apart and rejoining DNA using enzymes etc., inserts them into living cells, and causes them to replicate”.  
In addition, we understand that such breed improvement by using irradiation is not prohibited under the international standards, such as Codex Guidelines for Organic food production and other organic regulations in the EU, etc.

**(Related to Clause 5 “Manuring practice in fields”)**

**(Q11-1) What does “the method effectively utilizing biological functions” mean?**

(A11-1)

It means a soil improvement method utilizing the microbial decomposition of organic matter or the organic matter cycling processes involving living organisms, as the activities of worms, insects and microbes in the soil would contribute to the soil fertility.

**(Q11-2) Please explain the situations of “cases where the productivity of fields derived from soil are not maintained or increased only by methods utilizing biological functions”**

(A11-2)

It refers to the situations in which it's not possible to sustain the normal growth of the relevant crops due to lack of nutrients.

**(Q11-3) For the purpose of managing the manuring practices in the fields, in cases where microorganisms may be introduced from the outside or microorganisms are cultivated for the preparation of the “Fertilizers and soil improvement substances” provided in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, is it possible to use the following culture medium or growth medium?**  
a) Those to which chemical synthetic substances have been added in the process of manufacturing  
b) Those for which genetic recombination technology is used

(A11-3)

In the case of culture media for microorganisms, you should not use genetically modified organisms and chemo synthesized substances, as most of them may remain in the final material product. However, in cases where most of culture media would not remain in the final material product, as is the case with the culture of fungus spawn, you don't have to verify that such culture media are not genetically modified or chemo synthesized substances.

**(Q11-4) In cases where we can obtain only those seeds that have been sterilized by the substances other than those listed in the Annex B-Table-B.1 of JAS for Organic Products of Plant Origin, is it possible to use such seeds in the organic fields as Green Manure Seeds?**

(A11-4)

1. In case green manure crops are grown in organic fields for manuring practice, you need to use basically such seeds for green manure that satisfy the criteria specified in 5.4 (seeds or seedlings to be used in fields) of JAS for Organic Products of Plant Origin.
2. However, if it is difficult to get these seeds, 5.4.2 shall apply mutatis mutandis, and other than those seeds may be used.
3. The same shall apply to those seeds for cover crops, living mulches, companion plants, etc.

**(Related to Clause 5 “Spawns”, “Cultivation sites”, “Cultivation management in cultivation sites”)**

**(Q12-1) What kind of seed fungi are allowed for use?**

(A12-1)

Seed Fungi are, as defined in the “Standards for the Manufacture and Management of Mushrooms Beds for” (4 *Rinyasan* No.38, Notification of the Forestry Agency), the fungal body or culture that are intended to be used as seeds for cultivating mushrooms and its mycelia (as seeds) has been purely cultivated under the appropriate conditions.

Whereas the inoculated fungal beds are sometimes referred to as seed fungi, fungal beds are not included

in the seed fungi specified in the JAS for Organic Products of Plant Origin.  
Regarding the culture medium (materials) for the seed fungi (with which host wood log or fungal beds are to be inoculated), such materials specified in 5.5 (Spawns) of JAS for Organic Products of Plant Origin should be used basically.

**(Q12-2) With reference to “Sugar” specified as cultivation substance in 5.5.1-d)-3) of JAS for Organic Products of Plant Origin, is it possible to use any sugar for this cultivation purpose, that has gone through the refining process where such foods additives other than those specified in Annex A-Table A.1 and Annex B-Table B.1 of JAS for Organic Processed Foods have been used?**

(A12-2)

There's no other way but to allow such sugar (other than those additives specified in Annex A-Table A.1 or Annex B-Table B.1 of JAS for Organic Processed Foods have been used in its refining process) for use, since those culture substances for spawning listed in the 5.5.1 - d) of JAS for Processed Foods may be used only in the cases where it is difficult to obtain such seed fungi, that have been cultured by using those substances produced without using prohibited substances or, that have been cultured using natural substances or those derived from natural substances with no chemical treatment.

**(Q12-3) What kind of soil is allowed for use as cover soil in the mushroom cultivation on compost?**

(A12-3)

If such soil were brought over from somewhere other than a cultivation sites, such soil must be collected in the specific idle area where prohibited substances had not been used and have not drifted or run off from the surrounding areas in the past 2 years or more, and such prohibited substances have also not been used in such soil after collection.

**(Q12-4) What kind of materials are allowed for use in the compost-based cultivation of mushrooms?**

(A12-4)

As specified in 5.8.1 – a), such fertilizers and soil improvement substances specified in Annex A-Table A.1 of JAS for Organic Products of Plant Origin may be used only in the cases where it is difficult to cultivate or grow mushroom using only those substances derived from trees or those specified in this provision.

Among those specified in Annex A-Table A.1 of JAS for Organic Products of Plant Origin, the following substances are assumed to be used in the cultivation of mushrooms in compost:

Substances derived from plants and their residues, Substances derived from fermented, dried or calcinated manure, Quicklime (including dolomitic quicklime), Slaked lime, Calcium carbonate and Trace elements (manganese, boron, iron, copper, zinc, molybdenum, and chlorine).

**(Q12-5) With reference to 5.8.1 b)- 1) (Plant products), 2) (Processed foods) and 3) (Feeds), of 5.8 (Cultivation management at the Mushrooms cultivation site) of JAS for Organic Products of Plant Origin, are all those substances or materials not allowed for use, unless they are organic JAS certified and labelled with organic JAS seals (for grading)?**

(A12-5)

You may use such by-products (e.g., straw and bran from organic rice) of organic plant products that are produced and graded in accordance with the JAS for Organic Products of Plant Origin. So, Organic JAS grade-labeling is not absolutely necessary for such by-products, but you have to confirm that they are derived from organic plant products etc. before using them.

**(Q12-6) With reference to 5.8.2 and 5.8.3 of 5.8 (Cultivation management at the Mushrooms cultivation site) of JAS for Organic Products of Plant Origin, which stipulate that “If it's difficult to obtain substances specified in 5.8.1 a)~c), what does this mean?**

(A12-6)

For example, this would refer to a situation where it's difficult to get the required quantities of the relevant materials in compliance with the standards, as the available quantity is too little or the prices too high.

**(Q12-7) Is it possible to use Styrofoam plugs as fungal plugs after inoculation in the mushroom cultivation on the logs?**

(A12-7)

Just like the mulches used in the fields, such chemically treated sealing wax or Styrofoam plugs may be used, provided that such prohibited substances contained in them should not be eluted or seeped out into the mushrooms.

**(Q12-8) What kind of water should we use for growing sprouts without soil?**

(A12-8)

1. Chemically treated water such as electrolyzed water or chemical compounds added water should not be used for growing sprouts. However, sodium hypochlorite may be used only for the purpose of making the water used for growing sprouts drinkable.
2. Regarding the hygiene management of facilities for growing sprouts, please refer to the relevant part of the “Hygiene Management of Guidelines for Sprout Production” (published by the Agriculture, Forestry and Fisheries Research Council in September, 2015).

[https://www.maff.go.jp/j/syouan/nouan/kome/k\\_yasai/pdf/sprout\\_shishin.pdf](https://www.maff.go.jp/j/syouan/nouan/kome/k_yasai/pdf/sprout_shishin.pdf)

**(Q12-9) Is it possible to clean and disinfect the facilities and equipment that are used for growing sprouts without soil?**

(A12-9)

Such facilities, equipment etc. (used for growing sprouts) may be cleaned/disinfected with cleaning agent or ozonated water. However, after using them, you need to wash thoroughly with water and manage to prevent the possible contamination of the seeds or sprouts with the cleaning agent, etc.

Regarding the hygiene management of facilities for growing sprouts, please refer to the relevant part of the “Hygiene Management of Guidelines for Sprout Production” (published by the Food Safety and Consumer Affairs Bureau of Ministry of Agriculture, Forestry and Fisheries in September, 2015).

[https://www.maff.go.jp/j/syouan/nouan/kome/k\\_yasai/pdf/sprout\\_shishin.pdf](https://www.maff.go.jp/j/syouan/nouan/kome/k_yasai/pdf/sprout_shishin.pdf)

**(Q12-10) What type of lighting should we use in the cultivation facilities for growing sprouts without soil?**

(A12-10)

As the artificial lighting is not allowed for use in the cultivation facilities for growing sprouts, you may not use lights for the purpose of growing sprouts or developing chlorophyll in plants. However, you may use the necessary lighting provided that it is necessary to use lighting to ensure the efficiency in the workplace.

**(Related to Clause 5.10 “Pests and diseases control in fields or cultivation sites”)**

**(Q13-1) What are those three types of control methods specified in 3.12 (cultural control), 3.13 (physical control) and 3.14 (physical control) of JAS for Organic Products of Plant Origin? Please explain.**

(A13-1)

- (1) The cultural methods are practices to control pest and diseases by changing the crop cultivation methods, that specifically include the following: a) cultivation of resistant varieties; b) utilization of resistant rootstocks; c) utilization of sound seeds and seedlings; d) mixed planting, crop rotation and rotational cultivation of lowland fields; e) irrigation; f) plowing/tillage; g) utilization of cover plants; and h) shift in cropping season and growing period.
- (2) The physical methods are practices to control pest and diseases by using the physical means such as gravity, light, heat, sound and so forth, that include: a) selection of seeds by specific gravity; b) blocking out the lights; c) use of light traps and insect repellent lamp; d) use of plastic tapes; e) hot water seed treatment; f) soil solarization or soil steam sterilization; g) sonic pest repellent device; h) to use electric fields to control insect pests; and i) anti insects nets etc.



(3) The biological methods are the management of pests through the natural species interactions, that specifically include the following (note that you must comply with the provisions specified in the relevant regulations including Agricultural Chemicals Regulation Law): a) use of antagonistic microorganisms; b) use of natural predatory and parasitic enemies; and c) use of small animals.

**(Q13-2) With reference to “Cultural Control” specified in 3.12 of JAS for Organic Products of Plant Origin, what does “selection of crops and varieties” mean?**

(A13-2)

“Selection of crops and varieties” means to select a) those crops that are well-suited to the local climate or soil type, b) those crops and varieties that are resistant to noxious animals and plants, and c) those appropriate for mixed planting, crop rotation and rotational cultivation of lowland fields, that are performed to prevent soil degradation (caused by the continuous cropping) or to prevent outbreaks of pests.

**(Q13-3) With reference to “Cultural Control” specified in 3.12 of JAS for Organic Products of Plant Origin, what does “adjustment of planting season” mean?**

(A13-3)

It means to adjust the cropping season to avoid the peak pest season and thereby minimize the possible damage.

**(Q13-4) Is it permissible to apply rice bran, broken soybeans, soy pulp etc. to the paddy field to control weeds?**

(A13-4)

If rice bran, broken soybeans, soy pulp, etc. were applied to the paddy fields, the soil surface would be shaded and the oxygen deficiency would occur in the soil due to the activity of microorganisms, which would result in the suppression of weeds growth. So, such approach would be allowed as a mixed method of physical and biological controls.

However, if any chemically synthesized food additives were used in the manufacturing process of the soy pulp, etc., such materials (soy pulp, etc.) should not be applied directly to the fields, as they would fall under the prohibited substances.

**(Q13-5) Is it permissible to apply weakened noxious animals and plants (weakened by using agricultural chemicals specified in the Annex B-Table B.1 of JAS for Organic Products of Plant Origin) to the fields, for the purpose of introducing the predatory animals and microparasites?**

(A13-5)

Such usage is not permitted, as it would be considered as the non-approved use for agrichemicals.

**(Q13-6) With reference to 5.10.2 of JAS for Organic Products of Plant Origin, which stipulates that “... due to the imminent risk of significant damage to plant products...”, what kind of situation does this mean?**

(A13-6)

This refers to the cases where noxious animals and plants are present or predictable with reasonable accuracy in the surrounding fields or in the relevant fields, and significant damages to the relevant crops may be predictable from experience, if left alone. exist or are highly likely to emerge based on the previous experience, and products are likely to be seriously damaged.

**(Q13-7) What kinds of mulches are allowed for use?**

(A13-7)

Paper mulches allowed to use are limited to only those, for which chemical substances (excluding corn starch, which is used to disperse activated carbon) have not been added in the process for the manufacture of the final agricultural material product (paper mulch) from wastepaper.

Plastic mulch (including those to which corn starches are coated to prevent adhesion) may be used, on the condition that it must be removed from the field after use.

Biodegradable mulch is not allowed for use, as the chemical substances have been added to it in its

manufacturing process, and it cannot be removed from the fields after use.

#### **Related to Clause 5 (General Management and Seedling Management)**

**(Q14-1) Please explain why these two clauses (5.11 (General management) and 5.12 (Seedling management) were newly added to Clause 5 (Production Methods) of JAS for Organic Products of Plant Origin in the 2005 revision?**

(Q14-2)

1. Whereas those substances or materials, that contain chemically synthesized compounds and may contaminate the fields if they are applied to or in contact with the plants or soils, are not allowed for use obviously, as specified in the provision for “Pre-Harvest Management (excluding fertilizers and pesticides)” for the organic cultivation in the previous standards before 2015 revision, such provision specified in 5.11 (“General Management”) has made it clear to make people concerned (such as production process managers etc.) fully aware of and committed to compliance.
2. Another provision for “Seedling management” was set forth in 5.12, to clarify the requirements for the cases where organic seedlings are grown in the seedling boxes or seedling pots, or any places other than organic fields.

**(Q14-2) Is it permissible to use those substances specified in the Annex B-Table B.1 of JAS for Organic Products of Plant Origin, for the disinfection of the seeds (purchased or home-grown) produced in accordance with Clause 5 (of JAS for Organic Products of Plant Origin)?**

(Q14-2)

Yes, it is.

**(Q14-3) Is it permissible to use salt water for seed selection according to specific gravity?**

(Q14-3)

As the seed selection based on the specific gravities should be subject to compliance with the requirements specified in 5.11 (“General Management”) of JAS for Organic Products of Plant Origin, you may use such brine (salt water) for the seed selection based on the specific gravities, provided that the relevant brine be made with the salt that satisfy the requirements specified in afore-mentioned 5.11, (which defines those derived from natural substances or those derived from the natural substances that are not chemically treated, including those produced by using ion-exchange membrane).

**(Q14-4) Is it permissible to use seawater in the fields?**

(Q14-4)

As the application of seawater in the fields should be subject to compliance with the requirements specified in 5.11 (“General Management”) of JAS for Organic Products of Plant Origin, you may use such seawater in the fields, provided that the relevant seawater satisfy the requirements specified in afore-mentioned 5.11 (which defines those derived from natural substances or those derived from the natural substances that are not chemically treated, including those produced).

**(Q14-5) Does the “field” (specified in 5.1 of JAS for Organic Products of Plant Origin) include the places for raising seedlings (such as nursery boxes or nursery beds)?**

(Q14-5)

Such “Field” does not include facilities for raising seedling such as nursery boxes, pots or beds. However, if you are to raise seedlings in such facilities, such production process needs to be managed in accordance 5.12 (“Seedling Management”) of JAS for Organic Products of Plant Origin

**(Q14-6) If the seedlings were raised by using the soil obtained from a field in transition/conversion to the organic farming and transplanted into the same fields in transition/conversion (where the soils for raising seedlings were collected), would such soil be considered as those specified in 5.12.1 of 5.12 (“Seedling Management”) of JAS for Organic Products of Plant Origin?**

(Q14-6)

In the cases where seedlings were grown by using the soil collected from a field in transition/conversion and grown in the same field (where the soil was collected), such growing method would be considered in compliance with 5.12.1 of 5.12 (“Seedling Management”) of JAS for Organic Products of Plant Origin, because such method is considered the same as directly planting the seeds in the relevant field.

**(Q14-7) In case the seedlings are raised in non-organic fields, should such raising area be kept free from the prohibited substances for more than two years prior to raising seedlings?**

(Q14-7)

In case the seedlings are raised in the field (in the cases where the seedlings are raised in contact with the soil of the relevant area, including the cases where the seedlings are raised by the direct sowing or plants with taproots are raised in the seedling pots placed on the field), the relevant fields should be kept free from the drift or runoff of prohibited substances from the surrounding areas for the past 2 years or more. In case the seedlings are raised in any places other than the fields (in the cases where the seedlings are raised without using soils of the relevant area, e.g. raising seedlings on the shelf), it would be necessary to raise seedlings in the places where the drift or runoff of prohibited substances from the surrounding areas are prevented, in accordance with the criteria specified in 5.12 (Seedling Management) of JAS for Organic Products of Plant Origin, even though there are no specific rules specified for the period of time the prohibited substances were used before the start of raising seedlings in the relevant places.

**(Related to Clause 5.13 (“Management for Harvesting, Transportation, Selection, Preparation, Washing, Storage, Packaging, and Other Post-harvest Processes”))**

**(Q15-1) Would the management standards specified in 5.13 (“Management for Harvesting, Transportation, Selection, Preparation, Washing, Storage, Packaging, and Other Post-harvest Processes”) of JAS for Organic Products of Plant Origin, be construed as “the management criteria for the processes carried out before the products are delivered to the customers”?**

(A15-1)

Based on these standards, certified operators are supposed to manage their operation processes from harvesting to shipping of their products. Furthermore, it is necessary to prevent commingling of organic and nonorganic products and contamination with prohibited substances, all through the distribution process from shipping to delivery to the customers. If such commingling with non-organic products occurs in the distribution process, even distributors, who are not certified operators, need to remove/delete the relevant organic grade labels (Organic JAS Seals), as specified in Article 41 of the Act on JAS and Article 78 of Regulation for Enforcement of the Act on JAS.

**(Q15-2) What kinds of materials or substances should be used for cleaning the machines or tools involved in the processes specified in 5.13 (“Management for Harvesting, Transportation, Selection, Preparation, Washing, Storage, Packaging, and Other Post-harvest Processes”) of JAS for Organic Products of Plant Origin?**

(A15-2)

Whereas there are no specific provisions specified for the cleaners used for the machineries/equipment, it is necessary to wash cleaning agents thoroughly with water, after using any cleaning products, so as not to contaminate the organic products of plant origin.

**(Q15-3) With reference to 5.3.6 of JAS for Organic Processed Foods, which stipulates that “.... such chemical agents other than those specified in Annex C-Table C.1 may be used”, is it likewise possible to use any chemicals other than those listed in the Annex C-Table C.1 at the facilities for the preparation etc. of the organic plants?**

(A15-3)

In cases where such facilities are used for preparation for a limited period of time, you may use the chemical-agents other than those specified in Annex C-Table C.1 only when such facilities are not being used for the preparation, storage, etc. of organic products of plants origin, but before you use the relevant facilities for the preparation etc. of the organic products of plant origin, you must remove the cleaning

chemicals (you used) completely.

**(Q15-4) With reference to 5.13.3 of JAS for Organic Products of Plant Origin, which specifies that “however, in the case the substances specified in Table B.1 and Table C.1 are used, comingling of such substances with the plant products must be avoided”, could the plant products be contaminated with such substances in the cases where Carbon dioxide fumigant or Diatomaceous earth powder are used?**

(A15-4)

No, carbon dioxide fumigants are not considered as contamination source, because such dioxide fumigation is targeted only to kill the pests by suffocation, which may have negligible temporary impacts on the products. On the other hand, it would not be allowed to use diatom earth (granular formulation) by directly mixing it with grain, etc., as the use of such method falls under the category of adulteration or comingling. However, just applying such substances to the facilities would not be considered as comingling.

**(Q15-5) With reference to 5.13.3 – b) of JAS for Organic Products of Plant Origin, which stipulates that “For maintenance and improvement of the quality...” what does this mean? Please clarify.**

(A15-5)

Quality maintenance means to keep certain level of quality and suppress degradation of such quality, e.g. “freshness preservation technology using nitrogen, carbon dioxide, etc.” Examples of quality improvement includes the removal of astringency of persimmons by using ethanol (including alcohol) and so on.

**(Q15-6) Whereas the “ionizing radiation” is not allowed for use, as specified in 5.13.4 of JAS for Organic Products of Plant Origin, is it permissible to use ionizing radiation in the process control?**

(A15-6)

Yes, “the ionizing radiation” is allowed for use in the process control such as shape verification or foreign object inspections, while the ionizing radiation is not allowed for use in controlling noxious animals and plants, or for the purpose of food preservation or hygiene purposes.

Note that even in the latter cases, such radiation absorbed dose for food and drink products must be lower than 0.10 Gy. Additionally, there should not be any problems with the X-ray inspections of the imported food products for clearing customs.

**(Q15-7) For the purpose of protecting workers from insect bites, etc., is it permissible to use insect repellent in the fields and work areas?**

(A15-7)

Quasi-drugs for pest control such as insect repellents, that are used for human health may be used, provided that the possible contamination of the plant products be prevented as much as possible, (e.g.) using such quasi-drugs before entering the fields or work areas.

**(Q15-8) Whereas we understand that phytosanitary measures shall be applied to the wood packaging materials for imported goods, how would the organic plants be handled under such measures?**

(A15-8)

As this phytosanitary measure is assumed to be taken in the exporting countries to disinfect the export packaging materials, such wooden packaging materials labeled as disinfected, which has been disinfected in accordance with the international standards, shall not be subject to the phytosanitary measures.

Therefore, in case you are to export organic products of plant origin, etc. it would be possible to ensure the organic integrity and distribute the relevant organic products of plant origin etc., by using such wooden packaging materials (pallets, wooden boxes, wooden crates, etc.) labeled as disinfected and avoiding the direct contact between the organic products of plant origin etc. and the disinfected packaging materials.

On the other hand, it would be appropriate to avoid the use of those wooden packaging materials that are not labeled as disinfected, as the possible import inspection or contamination with the chemical substances would be anticipated.

Furthermore, should the relevant organic products of plant origin etc. be contaminated with the chemical

substances by the direct contact with the wooden packaging materials, the relevant grade labels must be definitely removed or deleted in accordance with Article 41 of Act on JAS.

**(Q15-9) Aren't there any chemical residues left in the organic plant products?**

(A15-9)

Organic agriculture is based on the principle of minimizing the use of external inputs and avoiding the use of synthetic fertilizers and pesticides. This cannot guarantee that products are completely free of chemical residues, due to general environmental pollution.

However, it is stipulated that the organic production should be carried out in such a way as to prevent pollution in ~~of~~ air, landfills and water as much as possible, by adopting the cultivation management methods with the least environmental effects of the agricultural production i.e. any substances permitted for use only in the unavoidable circumstances should be decided in accordance with *the Codex Guidelines*.

**(Related to Annex A-Table A.1 “Fertilizers and soil improvement substances”)**

**(Q16-1) What criteria are used to determine those substances listed in the Annex A-Table A.1?**

(A16-1)

Those fertilizers and soil improvement substances are listed in Annex A-Table A.1, based on the permitted substances specified in Annex 2 of Codex Alimentarius Guidelines.

**(Q16-2) What about the criteria for the substances allowed for use in organic plants production under the unavoidable circumstances?**

(A16-2)

1. Such substances or materials, that are allowed for use in the production of organic plant products under the unavoidable circumstances, are listed in the Appended Tables of the JAS for Organic Products of Plant Origin and such substances or materials should be derived from the origins described in the Criteria column of these Tables.
2. As specified in Article 2-(1) of Enforcement Order of the Act on Japanese Agricultural Standards, any chemically synthesized agricultural chemicals, fertilizers, and soil improvement substances other than those specified by the Competent Minister (Public Notice of Ministry of Finance and Ministry of Agriculture, Forestry and Fisheries, No. 31 dated Sept. 28, 2022), should not be used.
3. Even in the cases where the necessary preparations are to be made, such as drug preparation, when using those substances specified in the Appended Tables of JAS for organic products of plant origin, any use of such fertilizers and soil improvement substances are “limited to those to which no chemically synthesized substances are not added in the manufacturing process, and those for which recombinant DNA technology is not used in the production stage of its raw materials”, as specified in Table A.1.

**(Q16-3) Is it permissible to use such compost derived from genetically modified crops?**

(A16-3)

Whereas the use of recombinant DNA technology in the compost is clearly excluded, since the relevant provision of JAS for Organic Plant Products was amended in 2006 to read as, “such fertilizers and soil improvement substances are limited to those to which recombinant DNA technology is not used in the production stage of the raw materials”, however, in reality it would be very difficult to verify whether each of those substances (such as those derived from plants and their residents, those derived from fermented, dried or calcined manure, those derived from plants, livestock, marine products that were used in food or textile industries, oil cakes) are not derived from the genetically modified crops. For this reason, in consideration of the circumstances where it's difficult to obtain such substances, as specified in the Transition Measures of Supplementary Provisions, “substances other than these substances may be used until otherwise provided for by law.”

**(Q16-4) Whereas the criteria for the organic byproducts derived from food industries etc. specified in the Annex A-Table A.1 (“Fertilizers and soil improved substances”) was revised in 2005, isn’t it permissible to use those organic byproducts derived from food industries, that were allowed for use in the past?**

(A16-4)

As the relevant provision (criteria for the substances derived from plant, livestock, marine products, that were used in food or textile industries) of JAS for Organic Plant Products was amended in 2005 to read as, “those substances should be derived from the natural sources that have not undergone any chemical treatment (for preservation etc.) except for oil extraction by organic solvents”.

For this reason, such organic byproducts derived from the food manufacturing industry, which are chemically processed to the extent permitted for foods or to which food additives etc. are added, are not allowed for use, even though they were allowed for use before the amendment of this Standard.

On the other hand, such food waste arising from the food manufacturing industry, if fermented without mixing with any other substances, should be allowed for use, since such substances fall under the category of “Substances derived from fermented food waste”.

**(Q16-5) Whereas those substances ranging from fish meal powder to steamed bone, that had been specified in Annex A-Table A.1 of the JAS for Organic Products of Plant Origin, were deleted by the 2005 amendment, are those substances not permitted for use in the organic crop production any longer?**

(A16-5)

As the contents of Annex A-Table A.1 of the JAS for organic plant products have been reviewed and updated, after amendment such substances are included in “Substances derived from plant, livestock, and marine products, which were used in food or textile industries” and/or “Processed animal products from slaughterhouses or fish industries”.

Therefore, such substances should be allowed for use in the cultivation of organic plant products, as long as they meet the requirements specified in 5.7 (“Fertilizer management in the field”) of the same JAS, as well as the criteria for the relevant substances specified in Annex A-Table A.1, which should be those “Natural substances or substances derived from natural sources which have not undergone any chemical treatment”.

**(Q16-6) With reference to the criteria of “plant and wood ash”, which is specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin as “Natural substances or substances derived from natural sources, that have not undergone any chemical treatment”, is it necessary to verify whether any chemical substances were used at the production stage of the original plants?**

(A16-6)

No, you don’t need to verify whether any chemical substances were used at the production stage of the original plants or trees. As long as the original plants or trees have not undergone any chemical treatment after cutting or felling, such plant and wood ash may be allowed for use. The same applies to “Bark compost” or “Charcoal”.

**(Q16-7) In the cases where an ion exchange membrane is used at the refining processes of “potassium chloride or sodium chloride”, is it permissible to use processing aids such as hydrochloric acid, etc.?**

(A16-7)

Whereas potassium chloride and sodium chloride should be produced without using any chemical methods, as specified in Appended Table 1, those indispensable processing aids (such as hydrochloric acid added to prevent precipitation on the ion-exchange membrane or sodium hypochlorite added to sterilize seawater) are allowed for use in the refining method by using ion-exchange membrane.

**(Q16-8) Whereas “fossil shell fertilizers” were deleted from the Fertilizers and soil improvement substances specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, are those substances not permitted for use any longer?**

(A16-8)

In the 2006 revision, such fertilizers were listed by the more specific terms in the Annex A-Table A.1 of

JAS for Organic Products of Plant Origin, making this positive list as specific as possible, regardless of the names used in the Fertilizer Control Act.

For this reason, “Calcium carbonate fertilizers” was changed to “calcium carbonate”, and “fossil shell fertilizers” are deemed to be “calcium carbonate”, since their main component is the same as calcium carbonate. Therefore, “fossil shell fertilizers” are allowed for use and “Coral fossils” are also allowed for use.

**(Q16-9) With reference to “trace elements” specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, please explain what kind of substances they are. Is it permissible to use synthetic trace elements as well?**

(A16-9)

Whereas the trace elements include manganese, boron, iron, copper, zinc, molybdenum and chlorine, chemically synthesized trace elements such as “manganese sulfate” or “zinc sulfate” are also allowed for use, since these substances meet the criteria of trace elements, provided that any chemically synthesized substances other than trace elements are not added to the trace element themselves.

**(Q16-10) With reference to the criteria of “Stone meal”, which is specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin as “not contaminating the soil with harmful heavy metals or other harmful substances included in sources”, in what situations should such criteria apply?**

(A16-10)

We are assuming the situation where soil and air, etc. are not contaminated with hazardous substances such as “cadmium”, “lead”, “hexavalent chromium”, “arsenic”, “total mercury”, “alkyl mercuric compound” and “copper” etc., and other harmful substances such as radioactive substances and asbestos, keeping the soil etc. of the fields away from being contaminated, thus preventing any impact on the environment, in consideration of the environmental standards concerning soil pollution set forth in the Environment Basic Law or the standard value set forth in environment-related acts, such as the Agricultural Land Soil Pollution Prevention Act.

**(Q16-11) With reference to “By-products of the sugar industries” specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, what kind of products are they? Whereas the sugar refining industry generally involves a chemical treatment process, is it permissible to use such byproducts generated from such manufacturing processes?**

(A16-11)

By-products of sugar industries refer to those substances such as molasses, sugar, blackstrap molasses, bagasse and milk of calcium, etc. Such by-products of sugar industries, regardless of whether or not the chemical treatment is carried out in the sugar production process, are allowed for use, which is also in conformity with Table 2 of the Codex Guidelines. However, the by-products of sugar industries, to which chemical substances are added, are not allowed for use.

Blackstrap molasses arising from non-sugar industries may be allowed for use, provided that they meet the criteria of the “Substances of plant, livestock, or fish origin, as arising from the food and textile industries.

**(Q16-12) With reference to “other fertilizers and soil improvement substances” specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, what kinds of substances are allowed for use?**

(A16-12)

1. In principle, manure management practices in the fields etc. for the cultivation of organic plants should be based only on the methods, that utilize the compost derived from the residues of plant products produced in the relevant fields or functions of organisms living or growing in the relevant areas as set forth in 5.7 (Fertilizer management in the fields) of JAS for Organic Products of Plant Origin.

Only those fertilizers and soil improvement substances listed in Annex A-Table A.1 of JAS for Organic Products of Plant Origin are allowed for use only if it is unavoidable.

2. “Other fertilizers and soil improvement substances” specified in Annex A-Table A.1 of JAS for Organic Products of Plant Origin are allowed for use, only if the productivity of the agricultural land derived from the nature of soil cannot be maintained or improved by using other substances in this Table A.1.

3. For this reason, such “other fertilizers and soil improvement substances” are not allowed for use, in the cases where those substances may be substituted by the other substances listed in this Table A.1.
4. Those substances are also not allowed for use if it’s objectively obvious that they are effective in the control of pest and disease. (e.g. they may be classified as specific control substances under the Agricultural Chemicals Control Act).

**(Q16-13) With reference to “other fertilizers and soil improvement substances” specified in the Annex A-Table A.1 of JAS for Organic Products of Plant Origin, what about the criteria for determining whether the productivity of the agricultural land derived from the nature of the soil can be maintained and improved by using other substances in this Table A.1?**

(A16-13)

1. First of all, the following criteria specified in 5.7 (Fertilizer management in the fields) and Annex A-Table A.1 of JAS for organic products of plant origin should be considered for such decision-making.
  - a) The use of such substance is essential in the intended purpose or application, and such substance cannot be substituted by any other substances listed in Annex A-Table A.1 in terms of both quality and quantity.
  - b) Such substance must be a natural substance, or a substance derived from natural sources that has not undergone any chemical treatment (Limited to those, that are produced by combustion, calcining, melting, dry distillation, and saponification and those produced from natural substances by non-chemical methods.
  - c) Any substances produced by using recombinant DNA technology are not allowed for use.
  - d) Such substance should not be obviously effective in the control of pest and disease. (e.g. Effectiveness of substance in the control of pests and diseases is not recognized by the Subcommittee for Specific Agricultural Chemicals, the Agricultural Chemical Section of the Council for Agricultural Materials.)
2. Further to the above criteria, the following criteria should also be satisfied. Only those substances, that satisfy both criteria mentioned above as well as the followings may be allowed for use.
  - a) Manufacturing, use and final disposal of such substances should not cause or attribute to any adverse effects on the environment and the ecosystem.
  - b) Such ~~is~~ negative impacts on health and quality of life of humans or animals should be kept to the minimum.
  - c) Use of such substances should not have negatively impacts on the balance in soil system, physical properties of soil and air and water quality.

**(Q16-14) Is it permissible to use sewage sludge in the organic plants production?**

(A16-14)

It is assumed that the use of sewage sludge in organic production is limited to exceptional cases, because, in the cases where sewage sludge is to be used in the production of organic plant products, certified production process manager, who is to use the relevant substances, needs to manage and controls its origin and discharge process of all sewage sludge discharged by the relevant operators, and must be able to prove that all the relevant sewage sludge is natural substances or is derived from natural sources.

**(Q16-15) Is it permissible to use human-feces-based fertilizers?**

(A16-15)

It is not permitted to use human excrement, because those “materials derived from fermented, dried or baked excrements,” that are specified in Annex A-Table A.1 of JAS for organic products of plant origin, are limited only to those derived from livestock and poultry. However, the “methane-fermented digestive liquid”, which was added to this list in the 2012 amendment, and is allowed for use, even if it is made from human excrement, provided that they fulfill criteria specified in Annex A-Table A.1 of JAS for organic products of plant origin.

**Related to the Annex B-Table B.1 “Agricultural Chemicals”**



**(Q17-1) What about the criteria for the selection of those substances listed in Annex B-Table B.1?**

(A17-1)

The agricultural chemicals listed in Annex B-Table B.1 of JAS for organic products of plant origin, which can be used in pest control, are selected from those agricultural chemicals, that are registered under the Agricultural Chemicals Regulation Act (Act No.82 of 1948) and are also listed in Annex 2-Table 2 of *the Codex Guidelines*, and that are deemed necessary in consideration of the actual usages, etc., including those substances that may be added to this list, as needed, based on the “requirements for inclusion of substances in Annex 2 and criteria for the development of lists of substances by countries” specified in 5.1 of the *Codex Guidelines*.

**(Q17-2) With reference to “Biological pesticides such as natural enemies” specified in Annex B-Table B.1 of JAS for Organic Products of Plant Origin, what kind of substances would fall into this category?**

(A17-2)

“Biological pesticides such as natural enemies” may be defined as the use of living (beneficial) organisms or microorganisms (live or dead), also called natural enemies, themselves only, excluding those pesticides that are obtained by refining, concentrating, extracting the substances produced by such microorganisms, based on the followings:

- 1) “Microorganisms used for biological pest control” are specified in Table 2-III, Annex 2 of *the Codex Guidelines*, as Micro-organisms (bacteria, viruses, fungi) such as *Bacillus thuringiensis*, Granulosis virus, etc.
- 2) Those pesticides that are obtained by refining, concentrating, extracting the substances produced by such microorganisms would include antibiotics etc., which are not allowed for use under *the Codex Guidelines*. The following pesticides fall under the category of “Biological pesticides such as natural enemies” (as of June 1, 2020).
  - *Bacillus thuringiensis* (wetable powder or granular formulation) (irrespective of being dead or alive);
  - *Agrobacterium radiobacter* strain 84 agent;
  - *Frankliniella vespiformis* agent;
  - *Diglyphus isaea* agent;
  - *Eretmocerus eremicus* agent;
  - *Apathogenic erwinia carotovora* wettable powder;
  - *Aphidius colemani* agent;
  - *Amblyseius cucumeris* agent;
  - *Coniothyrium minitans* wettable powder;
  - *Neoseiulus cucumeris* agent;
  - *Neoseiulus californicus* agent;
  - *Pseudomonas fluorescens* wettable powder;
  - *Aphidoletes aphidimyza* agent;
  - *Steinernema carpocapsae* agent;
  - *Sternema glaseri* agent;
  - Zucchini yellow mosaic virus less virulent strain water soluble powder;
  - *Amblyseius swirskii* agent;
  - *Orius strigicollis* agent;
  - *Talaromyces flavus* wettable powder;
  - *Eretmocerus mundus* agent;
  - *Homona magnanima* granulosis virus *adoxophyes orana fasciata* granulosis virus wettable powder;
  - *Aphelinus asychis* agent
  - *Phytoseiulus persimilis* agent;
  - Pepper mild mottle virus less virulent strain water soluble powder;
  - *Trichoderma atroviride* wettable powder;
  - *Drechslera monoceras* agent;
  - *Harmonia axyridis* agent;

- Orius sauteri agent;
- Verticillium lecanii wettable powder;
- Pasteuria penetrans wettable powder;
- Spodoptera litura Nucleopolyhedrovirus wettable powder;
- Bacillus simplex wettable powder; and
- Bacillus subtilis wettable powder;
- Encarsia formosa agent;
- Neochrysocharis formosa agent;
- Variovorax paradoxus wettable powder;
- Paecilomyces tenuipes emulsifiable concentrate;
- Paecilomyces fumosoroseus wettable powder;
- Beauveria bassiana agent;
- Beauveria bassiana wettable powder;
- Beauveria bassiana emulsifiable concentrate;
- Beauveria brongniartii agent;
- Amblyseius californicus agent;
- Monacrosporium phytomatopagum agent;
- Chrysoperla carnea agent;

**(Related to the Annex C-Table C.1 “Chemical agents”)**

**(Q18-1) How should we carry out pest control or small animal control in the storage warehouses for the organic plant products?**

(A18-1)

Pest control or small animal control in the storage warehouses, etc. may be carried out by the physical methods such as physical barriers, sound waves, supersonic waves, light, ultraviolet rays, traps, temperature control, etc. or by using only those agricultural chemicals listed in Annex B-Table B.1 or Chemical agents listed in Annex C-Table C.1 of JAS for Organic Products of Plant Origin, provided that the effect of such physical methods is insufficient.

In the cases where such agricultural chemicals listed in Annex B-Table B.1 are used, it is necessary to refer to the instructions for use and confirm whether such chemicals are allowed for use in the warehouse, etc., before using such chemicals.

On the other hand, such chemical agents listed in Annex C-Table C.1 are not allowed for use in the production of organic plant products for the purpose of controlling pests and diseases, because such chemical agents are not pesticides. So, these chemical agents are used for the purpose of controlling, inducing, repelling, etc. the sanitary insect pests or nuisance insects.

For example, “capsaicin” listed in Annex C-Table C.1 may be used to prevent rodents from chewing on electrical wires or to repel pests.

**(Q18-2) With reference to the Criteria of Annex C-Table C.1 (Chemical agents) of JAS for Organic Products of Plant Origin, which stipulates that “Excluding the cases where it is used in the plant products production for the purpose of controlling pests and diseases”, what does this mean?**

(A18-2)

Among those chemical agents listed in Annex C-Table C.1 of JAS for Organic Products of Plant Origin, such substances that are not registered as agricultural chemicals (under Agricultural Chemicals Regulation Act), may not be used as agricultural chemicals. To prevent the possible misuse of those chemical agents (that are not pesticides), such provision is specified in the criteria of Annex C-Table C.1, which stipulates that “excluding the cases where it is used in the plant products production for the purpose of controlling pests”.

(Reference: Excerpts from Agricultural Chemicals Regulation Act)

Article 2 (Definitions)

(1)The term "agricultural chemicals" as used in this Act means bactericides, insecticides, herbicides and

other chemicals to be used for controlling bacteria, nematodes, mites, insects, rats, weeds, or other animals or plants or viruses (hereinafter referred to collectively as "pests") that harm crops (including trees, and agricultural and forestry products; hereinafter referred to as "crops, etc.") (those bactericides, insecticides, herbicides and other chemicals include substances specified by Cabinet Order among those in which the bactericides, insecticides, herbicides and other chemicals are used as their materials or ingredients, and which are used for that control), and growth stimulants, germination inhibitors and other chemicals (excluding the fertilizers provided in Article 2, paragraph (1) of the Fertilizer Regulation Act (Act No. 127 of 1950)) that are used for enhancing or inhibiting the physiology of crops, etc.

**(Q18-3) What kind of chemical agents can be used as attractants or repellents for noxious animals and plants in the harvest and post-harvest processes?**

(A18-3)

Such chemical agents listed in Annex C-Table C.1 of JAS for Organic Products of Plant Origin, as well as those made from foods or food additives may be used.

**(Related to the Annex D-Table D.1 “Substances for Preparation etc.”)**

**(Q19-1) Are there any specific requirements applicable to the “Hypochlorous acid water (allowed for preparation use etc.)”, that is specified in Annex D-Table D.1 of JAS for Organic Products of Plant Origin?**

(A19-1)

No, there are not any specific requirements specified for the “Hypochlorous acid water (allowed for preparation use etc.)” under JAS for Organic Products of Plant Origin. However, in the cases where any other standards are separately applicable under the Food Sanitary Act or any other related laws, it is necessary to satisfy the relevant standards.

**(Related to Supplementary Clause)**

**(Q20-1) Is it possible to use any substances or materials to adjust the viscosity of the soil for growing seedlings?**

(A20-1)

In the case of raising of seedlings in onion cultivation during the winter season, it is necessary to adjust the viscosity of seedling soil to certain level, as the root may not spread sufficiently in the seedling cells due to the low temperature.

For this reason, such soil viscosity adjustment materials (made from natural substances or those derived from natural substances) are being developed. However, in order to put them into practical use, further testing is required.

As such being the case, the following Transitional Measures are specified in Supplementary and Amended Provisions. “Notwithstanding the provisions of 5.12 (Seedling management) of the Japanese Agricultural Standard for Organic Products of Plant Origin amended by this public notice, polyvinyl alcohol, polyacrylamide, and substances derived from natural sources which have undergone chemical treatment may be used in the soil for raising seedlings of onions until otherwise provided for by law, only if it is unavoidable for viscosity adjustment”.

## **2. JAS for Organic Processed Foods**

**(Related to Clause 4)**

**(Q21-1) Why should processing methods be limited to those utilizing physical or biological functions?**

(A21-1)

Because it would be appropriate to use physical or biological processing methods in order to keep the characteristics of organic foods as ingredients, at all stages of manufacturing and processing. Please note that a similar approach is specified in *The Codex Guidelines*.

**(Q21-2) What exactly are those processing methods utilizing physical and biological functions?**

(A21-2)

Physical processing methods include mechanical methods such as comminution, mixing, molding, heating, cooling, compression, decompression, desiccation, and isolation (filtration, centrifugation, compression, distillation, etc.).

Biological processing methods (that utilize biological functions) include fermentation etc., that involves the use of fungi, yeast and bacteria. Fungi, yeast and bacteria in this case are not considered as ingredients. Please refer to (Q22-15)

If you have a question as to whether we should take those ingredients (used in the cultivation of these microorganisms) into account in the calculation of ingredients usage ratio.

**(Related to the Clauses 3 & 4)**

**(Q22-1) Regarding the definition of Organic Processed Foods, which was revised in 2006, please let us know the details of such revised definition.**

(A22-1)

The 2006 revision made clear that the food additives\* fall under the category of the non-organic ingredients.

(\*only those listed in Annex A-Table A.1 or Annex B-Table B.1 of JAS for Organic Processed Foods, are allowed for use)

The percentage of non-organic ingredients\*\*in total ingredients is defined as no more than 5 percent of the total weight of all the ingredients of the organic processed foods.

(\*\*non-organic plant products, non-organic livestock products, non-organic fishery products, and processed foods made of these products and food additives (excluding processing aids))

(Before revision)

Organic processed foods			
Organic ingredients	Non-organic ingredients	Food additives	Water and salt
A	B	C	D
$B / (A + B + C) \times 100 \leq 5\%$ <p>* D (water and salt) is excluded.</p>			

(Current)

Organic processed foods			
Organic ingredients	Non-organic ingredients	Food additives	Water and salt
A	B	C	D
$(B + C) / (A + B + C) \times 100 \leq 5\%$ <p>* D (water and salt) is excluded.</p>			

**(Q22-2) In cases where organic processed foods are used as ingredients in the production of finished organic processed food products, what should be taken into consideration?**

(A22-2)

In the production of organic processed foods, the following requirements (specified in Article 3 of JAS for Organic Processed Foods) must be satisfied:

- 1) Definition of organic processed foods
- 2) containing no less than 95 percent by weight of organic ingredients such as organic plant products, organic processed foods, or organic livestock products.

Based on the above, in the cases where organic processed foods are used as ingredients, it is necessary to obtain the ratio of organic ingredients (organic plant products and/or organic livestock products) of the relevant organic processed foods to calculate the organic ingredients ratio of the final processed products. If it's difficult to obtain such ratio of organic ingredients, you may calculate the final ingredients ratio, based on the assumption that the ratios are 95 percent by weight and satisfy the above definition of organic processed foods.

**(Q22-3) With reference to 5.1 of JAS for Organic Processed Foods, which stipulates that “If it's difficult to obtain organic plants, organic livestock products, organic algae or organic processed foods, anything other than those.....may be used”, what is the reason for this?**

(A22-3)

Because such provision was added to JAS as well to adopt a similar approach to *the Codex Guidelines*, which permit the use of non-organic ingredients up to 5% of total ingredients only in the cases where such organic ingredients are not available or in sufficient quantity in accordance with the specified requirements. “The cases where it is difficult to obtain organic ingredients” would mean the cases where availability of organic ingredients is extremely low and prices of such ingredients are significantly high.

However, in the cases where it is necessary to use the designated origin or designated types of ingredients, that are essential for the certain product specifications, if it's difficult to obtain such designated organic ingredients, non-organic ingredients may be used instead.

For example, in the cases where you need to use domestic ingredients as much as possible, if it's difficult to obtain domestic ingredient for the 5% or less portion of the total ingredients, but it's possible to obtain foreign ingredients, domestic non-organic ingredients may be used instead.

**(Q22-4) Regarding those alcohol beverages, that are labeled as organic (organic processed alcohol beverages of plant and livestock origin) in accordance with the Labeling Standard for Organic Materials in Alcoholic Beverage (NTA notice #7 in 2000) but not affixed with organic JAS seals, is it possible to use them as ingredients for the organic processed foods? Besides,**

- 1) Even during the transitional period before the entry into force of amended Act (to be amended to include Alcohol Beverages in the scope of Designated Agricultural and Forestry Products), isn't it permissible to use such organic processed alcohol beverages of plant and livestock origin as ingredients for organic processed foods?
- 2) Isn't it permissible to use those organic processed alcohol beverages of plant and livestock origin as ingredients for the organic processed foods, even if they were imported from the organic equivalency countries or regions?

(A22-4)

No, those alcohol beverages are basically not allowed for use as organic ingredients for the organic processed foods, unless they are affixed with the organic JAS seals, even in the above two cases, as the provision of 5.1 – a) of 5.1 (“Ingredients and additives (including processing aids”) of JAS for Organic Processed Foods stipulates that such organic processed foods (to be used as organic ingredients) are “limited to those to which the relevant grading labels are affixed to the relevant agricultural products or its packages, containers or invoices (excluding those, that are produced by the manufacturer or processor of the relevant organic processed food, and graded in accordance with the provisions of Article 10 or Article 30 of the Act)” However, in the cases where the ratio (by weight) of non-organic ingredients to the total weight of organic ingredients (excluding salt and water) and additives (excluding processing aids) is 5% or less, it's permissible to use such alcohol beverages, (that is not certified by organic JAS, but in conformity with the requirements specified in 5.1 – b) of 5.1 (Ingredients and additives (including processing aids)) of JAS for Organic Processed Foods, as non-organic ingredients, provided that it's difficult to obtain organic JAS certified

ingredients.

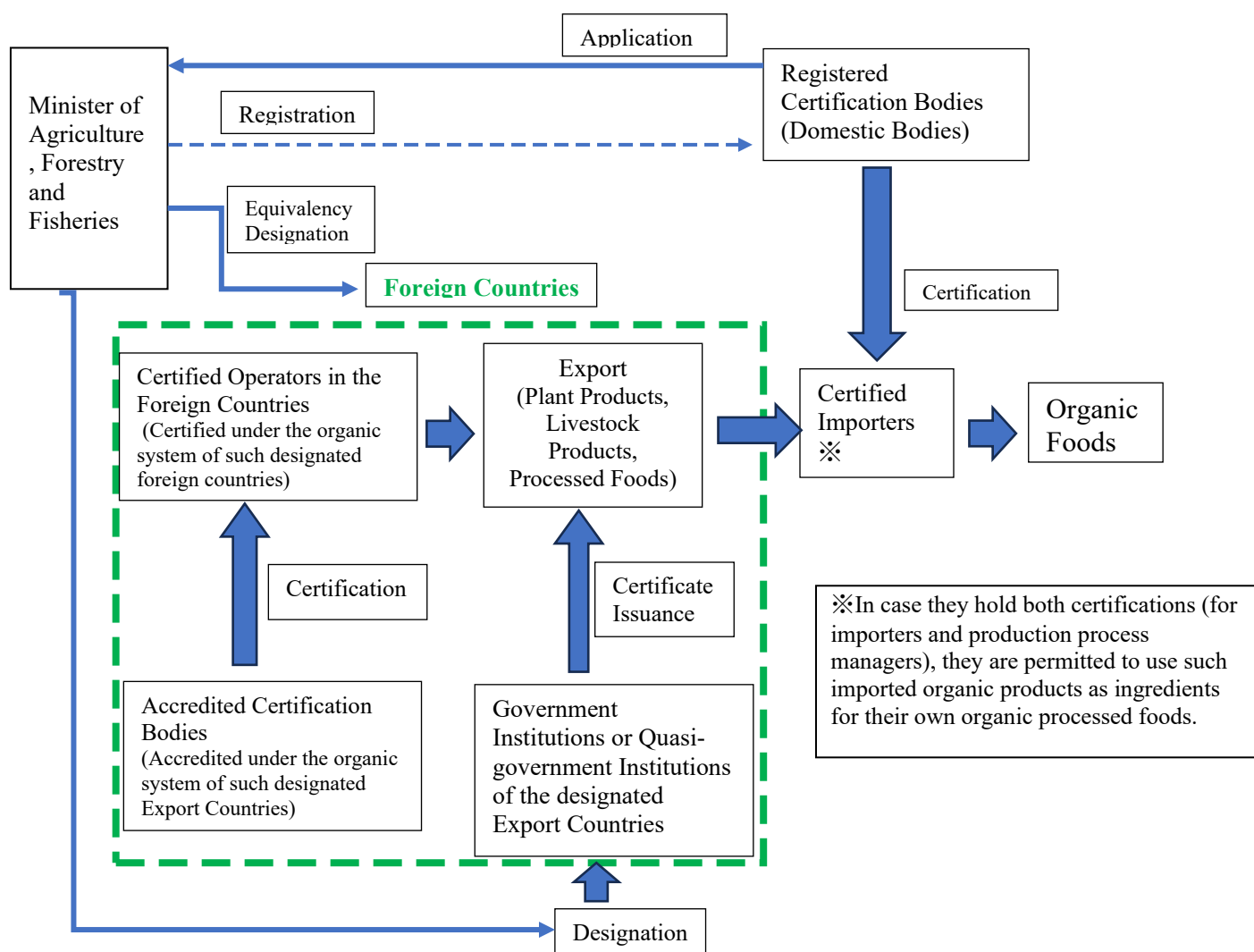
**(Q22-5) Whereas the ingredients are limited to those labeled with Organic JAS seals, what about those organic plant products or organic processed foods that have been graded using a grading system of a country recognized to have a grading system equivalent to the Organic JAS system but do not carry Organic JAS seals? Is it permissible to use those products as ingredients by obtaining a relevant certificate?**

(A22-5)

Regarding those Organic agricultural products etc., that have been graded under the grading system of a country (that is recognized as being equivalent to the Organic JAS system) and attached with the organic certificate issued by the relevant government authorities, if such products are to be distributed or sold as organic in Japan, they must be labeled with Organic JAS seals by a certified importer based on such foreign organic certificate.

In the cases where such organic products are to be used as ingredients in the organic processed foods, they must be affixed with Organic JAS seals and labeled as organic.

However, if such Japanese certified production operators (Organic JAS-certified operators in Japan) also obtained certification for Organic JAS-certified importers, they can use such imported organic agricultural (certified under the organic system of the equivalency country) products without attaching Organic JAS seals and produce organic processed foods, because the relevant organic JAS certified operator, as a certified importer, can confirm that the relevant organic agricultural products imported from the organic equivalency country (their organic system is recognized as being equivalent to organic JAS system) comply with the standards equivalent to the Organic JAS standards, based on the relevant organic certificates or management records obtained from the relevant government authorities.



**(Q22-6) Regarding the “Ingredients and additives (including processing aids)” specified in 5.1 of JAS for Organic Processed Foods, why should processing aids be included in additives?**

(A22-6)

In order to comply with the principle that the characteristics of organic food ingredients must be maintained, such processing aids should also be limited only to those allowed substances, because even those processing aids may cause chemical changes in foods.

**(Q22-7) With reference to the exceptional clause specified in 5.1 a) of 5. (Production Methods) of the JAS for Organic Processed Foods, does this mean duplicated grading or grading twice?**

(A22-7)

In the cases where the manufacturing operators are to produce the organic plant products (to be used as ingredients) and also produce the organic processed foods (as their finished products), they need to obtain organic JAS certification (in accordance with Article 10 of Act on JAS) to carry out grading for both organic plant products (for ingredients) and organic processed foods (as finished products) products. However, in the case of self-produced organic plant products to be used as ingredients for their finished products, they don't need to affix organic JAS seals to those products.

**(Q22-8) Is it permissible to use lactic acid bacterium as ingredients under JAS for Organic Processed Foods?**

(A22-8)

Yes, lactic acid bacterium is included in those Food & Beverages specified in 5.1 – b) of JAS for Organic Processed Foods, that include microorganisms such as lactic acid bacterium or yeast, fulvic acid, in addition to plant products, livestock products, algae products, under the JAS for Organic Processed Foods. However, any microorganisms used for fermentation shall be evaluated in accordance with 5.3.1 (rather than 5.1 – b)) of JAS for Organic Processed Foods, as they do not fall under the scope of Food & Beverages specified in 5.1 -b) of this standard.

**(Q22-9) With reference to 5.1 (Ingredients and additives (including processing aids)) of JAS for Organic Processed Foods, which stipulates that “Organic products of plant/livestock origin and processed foods, that are in the same category as those products (organic plant products, organic livestock products, organic algae, and organic processed foods) used as ingredients”, how can you determine specifically which product falls into which category?  
For example,  
“*Kurome daizu*” (dark hilum soybeans) and “*Shirome daizu*” (white hilum soybeans),  
Cabernet Sauvignon and Muscat Bailey A  
Green soybeans and Soybeans, Non-glutinous rice and Glutinous rice, Tomato ketchup and Tomato puree, “*Sencha*” (Green tea of middle grade) and “*Matcha*” (powered green tea),  
“*Koikuchi shoyu*” (dark soy sauce) and “*Usukuchishoyu*” (light soy sauce)**

(A22-9)

We would have to decide that on a case-by-case basis, but those products with the same common names are basically considered to be the same.

To be more specific about those examples,

“*kurome daizu*” (dark hilum soybeans) and “*shirome daizu*” (white hilum soybeans) would fall into the same crop category as soybean products, and Cabernet Sauvignon and Muscat Bailey A would also fall into the same crop category as grapes, whereas nonglutinous rice and glutinous rice would not fall into the same crop category. In addition, tomato ketchup and tomato puree, green tea of middle grade and powered green tea, “*koikuchi shoyu*” (dark soy sauce) and “*usukuchi shoyu*” (light soy sauce) would not fall into the same category of processed foods.

**(Q22-10) With reference to “Those products produced by recombinant DNA technology” specified in 5.1 - b)-3) of JAS for Organic Processed Foods, what does this mean specifically?**

(A22-10)

This means the crops obtained by recombinant DNA technology and the processed foods made thereof using such GM crops as ingredients. However, those dairy products or meat, etc. that are obtained indirectly from the livestock consuming feed containing GM crops (obtained by recombinant DNA

technology), are excluded.

**(Q22-11) Regarding the “Ionizing radiated foods” specified in 5.1 - b)-2) of JAS for Organic Processed Foods, how can we verify whether the foods have been treated with ionizing radiation?**

(A22-11)

In Japan, the use of irradiation is limited only to the case where irradiation may be used on potatoes to prevent germination. You can verify it by checking the labels of such irradiated foods, as irradiated food must be labeled as such, in accordance with the provisions specified in Food Labeling Standards (Cabinet Office Order No.10 of March 20, 2015).

**(Q22-12) Is it permissible to use any substances other than those specified in Annex A-Table A.1 or Annex B-Table B.1 of JAS for Organic Processed Foods, in the production of Food & Beverage (excluding organic plant products, organic livestock products, organic algae, and organic processed foods), Oils & Fats, and Salt?**

(A22-12)

Yes, it is permissible to use any food additives other than those specified in Annex A-Table A.1 or Annex B-Table B.1 in the production of Food & Beverage (excluding organic plant products, organic livestock products, organic algae, and organic processed foods), Oils & Fats, and Salt.

However, in the cases where such additives used in the ingredients of the organic processed foods may still have a technical effect in the finished products (organic processed foods) rather than being carried over (\*Note), such additives are not allowed for use, as such additives are considered to be used in the relevant organic processed foods.

(\*Note): “Carry-overs”

Carry-over additives are used in the production/processing of the ingredients of foods and are not used in the manufacturing/processing stages of the relevant foods. Any remaining amount of such additives contained in the relevant foods should be too small to have a technological effect.

**(Q22-13) Is it permissible to use refined salt mixed with seawater bittern, as salt in the processing of organic processed foods?**

(A22-13)

Such salt allowed for use in the processing of organic processed foods would include refined salt and processed salt, which are composed primarily of sodium chloride, also known as salt.

Please note that such salt, to which flavor enhancer, various minerals (excluding natural bittern derived from seawater or rock salt), etc. are added, should be excluded from the permitted salt in the organic processed foods production.

**(Q22-14) Whereas the non-organic percentage of the total ingredients should be no more than 5 percent, is such percentage calculated based on the total raw materials or based on the finished products?**

(A22-14)

Such percentage is calculated based on the blending ratio of raw materials.

However, in the cases where the same kind of ingredients in different states or conditions such as undiluted (solution), concentrated, or dried, etc. are to be mixed for use, each ingredient should be converted to the equivalent state of the major ingredients for the calculation of such percentage. (e.g. freshly squeezed juice and concentrated juice, liquid *dashi* (soup stock) and powdered *dashi* (soup stock), konjac raw potato and konjac powder.)

In case those raw materials such as concentrated juice or konjac powder, that are dried or prepared for storage or preservation purpose, are to be used as ingredients, weight of such raw materials should be converted to that of squeezed juice or raw potato by adding water to them, for the calculation of the weight percentage of organic foods ingredients.

For example, it's possible to convert the weight of concentrated juice to that of 100% juice, as both of them fall under the same type of raw materials, (because concentrated juice can be reduced to 100% juice by adding water), but it's not possible to convert the weight of bonito flakes extract to that of bonito flakes, as both of them do not fall under the same raw materials, (because bonito flake extract cannot be reduced to bonito flakes).

Please note that the weight of processing aids (which do not remain in the finished products) must be



excluded from the total weight of ingredients (based on which up to 5% of the remaining ingredients should be calculated accordingly).

**(Q22-15) Is it permissible to use any ingredients produced by recombinant DNA technology for the processed foods other than organic processed foods (which can be used as ingredients (no more than 5% of the total) for organic processed foods)?**

(A22-15)

As all the ingredients of organic processed foods must not be produced by using recombinant DNA technology it is not permissible to use any ingredients produced by using recombinant DNA technology, even if the total percentage is not more than 5% of the total product.

**(Q22-16) In the cases where we use the biological function for the organic processed foods production, is it permissible to use the microorganisms cultured with the following materials?**

- Any ingredients other than those organic products (organic plant products, organic livestock products, organic algae, and organic processed foods)
- Any materials modified by recombinant DNA technology

(A22-16)

Since substances or materials used for microbial culture are not considered as direct raw materials or ingredients for the organic processed foods, it is permissible to use the microorganisms cultured (through the following media), under unavoidable circumstances:

- materials other than organic plants, organic livestock products, organic algae and organic processed foods
- materials produced by using recombinant DNA technology.

However, should such microbial culture medium raw material remain in significant quantity (5% or more) in the manufacturing process of such processed foods, without being removed, such materials shall be viewed as ingredients.

**(Q22-17) Explain why those organic foods containing 70% or more and less than 95% organic ingredients are not recognized under JAS for Organic Processed Foods.**

(A22-17)

According to the Codex Guidelines, non-organic ingredients may be used within the maximum level of 5 percent, in the cases where organic ingredients are not available or in sufficient in quantity, while member countries may consider the development of specific provisions for products containing 70% or more and less than 95% organic ingredients, which are marketed in their territory.

In the developments of JAS for Organic Processed Foods, in consideration of the production practices and consumer preferences, we have decided that up to 5% of non-organic ingredients (other than organic foods) are allowed for use in accordance with the provisions of the Codex Guidelines.

**(Q22-18) Whereas it is not permissible to use ionizing radiation for the purpose of controlling noxious animals and plants, as well as preserving or sanitizing foods, is it permissible to use it for the purpose of process management?**

(A22-18)

Whereas it is not permissible to use ionizing radiation for the purpose of controlling noxious animals and plants, as well as preserving or sanitizing foods, it is permissible to use it for the purpose of process management such as inspection of content quantity or shape, and inspection of foreign materials.

Even in such cases radiation dose absorbed by the foods & beverages should not exceed 0.10 Gy

On the other hand it is permissible to conduct X-ray inspection for customs clearance of imported foods.

**(Q22-19) Is it permissible to use synthetic disinfectants or detergents for the purpose of cleansing plant products used as ingredients for the organic processed foods?**

(A22-19)

As the provision 5.1 (of JAS for organic processed foods) stipulates that processing aids are included in additives, it is not permissible to use any processing aids other than those specified in Table A.1 and Table B.1 of JAS for Organic Processed Foods.

**(Q22-20) What kind of water can be used as ingredients for the organic processed foods? Is it permissible to use any disinfectants (e.g. sodium hypochlorite) to make well water safe to drink?**

(A22-20)

Water used in the food production must be the water for food production specified in the Standards • Criteria for Foods and Additives (Notification No. 379 of the Ministry of Welfare, December 28, 1959). However, this does not apply to the cases where seawater is used as *Shikomi* water in *Shoyu* production. Besides, it is not permissible to use chemically treated water such as electrolyzed water or such water to which chemically synthesized substances other than those food additives specified in Table A.1. Whereas it is permissible to use sodium hypochlorite for the purpose of making water safe to drink, it is not permissible to use it for other purposes in the manufacturing process.

**(Q22-21) Is it permissible to clean and disinfect the machines and equipment used in the processing process?**

(A22-21)

Yes, it is permissible to do it, by using detergents, ozonated water or electrolyzed water, etc. However, you need to take control such as washing thoroughly with water after use in such a way that the raw materials or products are not contaminated with the detergents, etc.

**(Q22-22) Is it permissible for the production process managers to add deoxidants to the package of the products?**

(A22-22)

Yes, it is possible for them to use deoxidants if the relevant organic products are not contaminated by them.

**(Q22-23) Whereas it was not permissible to use salt as ingredients for organic alcohol beverages, in accordance with the Labeling Standard for Organic Materials in Alcoholic Beverage (NTA notice #7 in 2000), is it permissible to use salt as ingredients for organic alcohol beverages under the organic JAS for processed foods?**

(A22-23)

Whereas it was not permissible to use salt as ingredients for organic alcohol beverages, because salt is excluded from the ingredients for organic alcohol beverages in accordance with the Labeling Standard for Organic Materials in Alcoholic Beverage (NTA Notice No.32 of 2022), salt is included in the permitted ingredients under the JAS for Organic Processed Foods.

In recent years, there are various products (including those produced using salt as an ingredient) sold in the market due to diversification of the alcohol beverages.

Under such circumstances, in the wake of JAS revision, we have decided to permit the use of such salt (allowed in Organic JAS Processed Foods) in the production of organic alcohol beverages.

Additionally, in the case of salt used as an ingredient, salt (by weight) should be excluded from the calculation of usage rate.

(Note-1:) However, during the conversion process to JAS for Organic Processed Foods, salt is not allowed for use as an ingredient in the production of organic alcohol beverages, to which the Labeling Standard for Organic Materials in Alcoholic Beverage (NTA notice #7 in 2000) applies

(Note-2:) Such salt allowed for use in the production of organic processed foods is commonly known as edible salt, which is consisting primarily of sodium chloride.

**(Q22-24) In case distilled alcohol is used as an ingredient for organic alcohol beverages, is it permissible to use those that are not bearing organic JAS seals?**

(A22-24)

In case it is difficult to obtain organic JAS graded ingredients, non-organic ingredients may be allowed for use in the production of organic alcohol beverages on the condition that the ratio of the total weight of non-organic ingredients, etc. to the total weight of ingredients (excluding salt and water) and additives (excluding processing aids) must be 5% or less, provided that the requirements specified in 5.1 (Ingredients and Additives including processing aids) – b) of JAS for Organic Processed Foods be satisfied. Besides, such distilled alcohol (including those produced and graded by the production process managers of organic processed foods themselves, who produce organic alcohol beverages), which are bearing

organic JAS seals (displayed on its package), may be used as an ingredient.

(Note 1:) Such distilled alcohol means those obtained generally by the continuous distillation of fermented starch made from blackstrap (remaining liquid after extracting sugar crystals from the molasses obtained from sugar cane, etc.) molasses, grains, cassava, etc.

(Note 2:) In the cases where distilled alcohol is used as an ingredient in the production of organic alcohol beverages, usage rate is to be calculated as follows.

- a) In case water is added to distilled alcohol after distilled alcohol is moved into the manufacturing facility, usage rate is calculated based on the distilled alcohol weight before adding water.
- b) In case water is already added to distilled alcohol before distilled alcohol is moved into the manufacturing facility, usage rate is calculated based on the distilled alcohol weight after adding water.

**(Q22-25) Oak chips used in the production of alcohol beverages, for example, is it permissible to use such raw materials, that shall be removed later, in the production of organic processed foods?**  
**If it's permissible, please let us know how we can calculate composition, even though they are not contained in the final products.**

(A22-25)

As oak chips (chips or small pieces of oak wood (*Quercus* species in the family of Fagaceae)) are allowed for use as an ingredient in the production process of fruit wine, etc., they may be allowed for use even in the production of organic wines, etc., subject to the provision specified in 5.2 (The percentage of ingredients and additives) of JAS for Organic Processed Foods, provided that the requirements specified in 5.1 (Ingredients and Additives including processing aids) of JAS for Organic Processed Foods be satisfied. As oak chips to be used in the wine production are considered as ingredients under JAS for Organic Processed Foods, it is necessary to calculate composition of ingredients accordingly. In this case, such composition calculation should be based on the weight of oak chips.

In the cases where it is possible to calculate the weight of components extracted from the oak chips by operator's test results, etc., it would be permissible to calculate composition using such weights of extracted components, as the used oak chips can be removed after the immersion step in the production process.

#### **(Related to the Annex Tables)**

**(Q23-1) Is it permissible to use any substances obtained by recombinant DNA technology as raw materials in the production of food additives?**

(A23-1)

No, it is not permissible to use any ingredients obtained by recombinant DNA technology.

It is also necessary to verify whether any raw materials obtained by recombinant DNA technology are used for the subsidiary raw materials (e.g. ethanol etc. used as subsidiary raw materials for natural fragrance) as well.

**(Q23-2) Is it permissible to use calcinated calcium, which is included in the existing additives, in the processing of the organic processed foods?**

(A23-2)

1. It is permissible to use only those food additives listed in Annex A-Table A.1 or Annex B-Table B.1 of JAS for Organic Processed Foods in the manufacturing or processing process of organic processed foods.
2. For this reason, calcinated calcium is not allowed for use in the manufacturing or processing of organic processed foods, as it is not included in Annex A-Table A.1 of this Standard. However, those food additives derived from the calcinated calcium, that satisfies the criteria of calcium carbonate (a food additive) listed in Annex A-Table A.1 or Annex B-Table B.1 of this Standard, is allowed for use.
3. In this case, such food additives should be labeled in accordance with the relevant provisions of Food Sanitation Law and related ordinances (as to whether the food additive is labeled as "calcium carbonate" as specified in Table A.1 of this Standard or as "shell calcinated calcium" as an existing food additive).

**(Q23-3) Is it permissible for the certified re-packers or certified importers to carry out nitrogen injection in the tea packaging process?**

(A23-3)

No, if they are to carry out nitrogen injection, they need to obtain certification for the production process managers of organic processed foods, because it is not permissible for certified re-packers or certified importers to use such food additives (listed in Annex A-Table A.1 or Annex B-Table B.1 of JAS for Organic Processed Foods) within the scope of their permitted processes, whereas nitrogen injection in the tea packing process falls under the process of adding additives, and it is permissible for the certified production process managers of organic processed foods to use such food additives listed in Annex A-Table A.1 or Annex B-Table B.1 of this Standard are allowed for use under the JAS for Organic Processed Foods.

**(Q23-4) Why was the list of chemicals specified in Annex C-Table C.1 of JAS for Organic Processed Foods revised completely?**

(A23-4)

1. Some of the chemicals listed previously in Annex C-Table C.1 of JAS for Organic Processed Foods were rarely used in the process of manufacturing and processing.
2. For this reason, the previous list was completely deleted in the 2005 revision and replaced by a new list, and, among the generally used chemicals for pest control in the process of manufacturing and processing, those chemicals that meet *the Codex Guidelines* were added to this new list accordingly.
3. Moreover, in the 2012 revision, those chemicals that had not been practically used were deleted.

**(Q23-5) Whereas Potassium Pyrosulfite (including Potassium Hydrogen Sulfite Solution) is listed in Annex B-Table B.1 of JAS for Organic Processed Foods, is it permissible to use Potassium metabisulfite or potassium bisulfite (instead of Potassium Pyrosulfite)?**

(A23-5)

Yes, both Potassium metabisulfite and potassium bisulfite are allowed for use (as “Potassium Pyrosulfite (including Potassium Hydrogen Sulfite Solution)”) in the production of organic alcohol beverages, as both of them are defined as alternate names for Potassium Pyrosulfite under the Food Sanitation Act. Please note that the use of additives is subject to the requirements separately under the Food Sanitation Law or Liquor Tax Act and related laws and regulations.

**(Q23-6) In the cases where we produce organic processed foods other than organic alcohol beverages, by using in-house alcohol beverage products as its ingredients, is it permissible to use those additives that are listed in Annex A-Table A.1 of JAS for Organic Processed Foods but not in Annex B-Table B.1 of JAS for Organic Processed Foods, in the production of such organic beverages?**

(A23-6)

No, such additives (listed in Table A.1 but not in Table B.1 of JAS for Organic Processed Foods) are not allowed for use in the production of such organic alcohol beverages (to be used as ingredients for the finished processed foods) even in the cases where final products may be the processed foods other than alcohol beverages, because those allowed for use in the production of organic alcohol beverages are listed in Table B.1, which may be essential while 5.3 of JAS for organic processed foods stipulates that “the use of additives must be limited to the minimum extent necessary”.

Please note that those additives allowed for use in the production of the relevant organic processed foods (excluding the production process of the organic alcohol beverages used for the ingredients of the finished products) are only those listed in Table A.1.

**(Q23-7) Is it permissible to use those additives listed in Annex B-Table B.1 of JAS for organic processed foods in the production of organic *Sake Lees*?**

(A23-7)

Yes, those additives listed in Table B.1 of JAS for organic processed foods are allowed for use in the production process of organic refined *Sake*, as organic *Sake Lees* are produced in this *Sake* production as its by-products.

**(Q23-8) In the cases where the *Sake* breweries (that are certified for production process managers of organic processed foods) are to produce/grade the refined *Sake* containing seed vinegar (as raw material for the edible vinegar), that have been made unsuitable for drinking, at the request of the edible vinegar producer, is it permissible to use those additives listed in Annex B-Table B.1 of JAS for Organic Processed Foods?**

(A23-8)

Yes, it is permissible to use those additives listed in Table B.1 of JAS for organic processed foods in the production process of organic refined *Sake*, which is an intermediate product produced in the production process of organic edible vinegar (finished product).

### **3. JAS for Organic Livestock etc. (Related to Clause 3)**

**(Q24-1) Whereas the species of domestic animals and poultry are limited to only those specified in 3.2 and 3.3 of JAS for Organic Livestock Products, isn't it possible to grade those livestock products derived from any other species?**

(A24-1)

No, we have decided that it's not necessary to include such products at the initial implementation of this standard, because we assume that the distribution of such organic livestock products derived from other than those livestock or poultry specified in this standard might be extremely limited, given the current situation of the number of livestock or poultry for each species in Japan.

**(Q24-2) What kind of items are included in this Standard?**

(A24-2)

Those livestock products (livestock, meat (including organs), edible bird eggs, unprocessed raw milk and bones) produced in accordance with Clause 5 of JAS for Organic Livestock Products are within the scope of this Standard.

Any products derived from the livestock products, other than those specified in 3.2 (Livestock) and 3.3 (Poultry), such as honey, are outside the scope of this Standard.

The types of livestock or poultry (which are to be certified and graded) shall be reviewed as needed in the future, in consideration of the production/distribution status of the organic livestock products.

**(Q24-3) In the cases where we carry out "in-house feeds production or blending for organic livestock", is it necessary to obtain a certification for a production process manager of "organic feeds"?**

(A24-3)

In the cases where certified production process managers for organic livestock products carry out "in-house feeds production or blending for organic livestock", it is not necessary for them to obtain a certification for a production process manager of "organic feeds additionally, because their feeds production facilities, or their implementation methods for the production process management or control have been confirmed by the accredited certification bodies in accordance with technical criteria for the certification of production process managers.

In such cases, it is permissible to provide such feeds to the livestock or poultry at the relevant farm as organic feeds without attaching the Organic JAS Seals to the relevant feeds.

However, if they are to ship the surplus feed products as organic feeds, they need to obtain certification for production process managers for organic feeds, grade the relevant feeds and affix Organic JAS seals to those feeds.

**(Q24-4) Regarding the "Livestock replenishment" specified in 3.1.5 of JAS for Organic Livestock Products, which stipulates that "no more than 1/3 of the domestic animals shipped or deceased in the last 3 business years", what about the cases where less than three years have elapsed since the start of organic breeding?**

(A24-4)

In case of the 2<sup>nd</sup> year operation from the initiation of the organic breeding, such number should be not more than the number of livestock shipped or deceased in the previous year.

In case of the 3rd year operation (from the initiation of the organic breeding), such number should be not more than ½ of the total number of livestock shipped or deceased in the past 2 years.

**(Q24-5) Regarding the “Average amount of feed intake” specified in the Annex C-Table C.1 of JAS for Organic Livestock Products, how these figures are calculated?**

(A24-5)

These average feed intake figures are calculated as follows.

1) Bovine animals for Meat production:

Such figure is calculated based on the assumption that ME (Metabolizable Energy) = 2.353 and that TDN (Total Digestible Nutrients) = 65%, using Standard Growth Charts for Holstein cattle and Japanese black cattle

as a reference.

2) Bovine animals for Milk production:

Based on assumption that daily milk yield per one delivered cow = approx. 30kg, such figure is calculated in accordance with the Japanese Feeding Standards for Dairy Cattle (2006 version).

3) Porcine animals:

Such figure is calculated by adding the incremental intake from pasturing to the dried foodstuff intake, which is recalculated from the digestible energy demand based on the Japanese Feeding Standard for Swine (2005 version).

a) Pregnant Sows:

Such figure is calculated based on the average feeding amount for pregnant sows (weight of 190kg; fourth pregnancy), in consideration of the relevant livestock’s free movement.

b) Lactating Sows:

Such figure is calculated based on the average feeding amount for lactating sows (after 6th childbirth), in consideration of the relevant livestock’s free movement.

4) Meat Chickens and Laying Hens:

Such figure is calculated based on the standard growing weight of and feeding amount for broilers and laying hens during the incubation period in accordance with the Japanese Feeding Standards for Poultry (2004 version), in consideration of the relevant poultry’s free movement.

**(Q24-6) Are those crops such as turnip, beet, bamboo, etc. included in the scope of the roughages specified in 3.2 of JAS for Organic Livestock Products?**

(A24-6)

Yes, those crops such as turnip, beet, bamboo, etc. are included in the fodder crops (limited to those consisting of the entire above ground parts including stems and leaves) and fall under the definition of roughages specified in 3.2 of JAS for Organic Livestock Products

**(Related to Clause 4)**

**(Q25-1) Regarding the Clause 4, which stipulates that, “.... based on the principle of avoiding the use of veterinary drugs ....”, what does this mean specifically?**

(A25-1)

As specified in 5.5.3 of 5.5 (Health Management), “unless a specific disease or health problem has occurred or is likely to occur and no other appropriate treatment or control method is available”, it is not permissible to add antibiotics or hormones to the feed on a daily basis and provide it for the livestock. Additionally, hormone drugs are also not allowed for use for the purpose of managing breeding cycles.

**(Related to Clause 4 “Housing for domestic animals or poultry”)**

**(Q26-1) Regarding the provision 5.1.1 -a) of JAS for Organic Livestock Products, which stipulates that “Livestock are allowed free access to feeds and fresh water”, what specific measures are necessary?**

(A26-1)

The following may be considered depending on the species of livestock or type of breeding.

- 1) To place enough livestock waterers that provide all the number of livestock with constant supply of water
- 2) To secure the appropriate drinking areas (to provide livestock with appropriate access to water sources or waterers)
- 3) To provide livestock with continuous or frequent access to feed, etc.

**(Q26-2) Are there any specific standards or guidelines available for “fresh water?”**

(A26-2)

Such specific numerical criteria are not available for water quality, etc.

However, it is necessary to provide sanitary water, which is harmless to the animal health, in consideration of the physiological needs of livestock and poultry.

**(Q26-3) Regarding the provision 5.1.1 -b) of JAS for Organic Livestock Products, which stipulates that “it has a sturdy structure that maintains appropriate temperature, humidity, ventilation, air flow and brightness from sunlight”, is there any specific numerical criteria available? Are there any requirements such as window sizes, etc.?**

(A26-3)

Any numerical criteria for temperature, humidity, brightness, etc. or specific conditions for window size, ventilation, etc. are not specified.

In order to assure the appropriate temperature, humidity, brightness from sunlight for each livestock or poultry house, it is necessary to take the local circumstances into account and manage it in consideration of the physiological needs of livestock and poultry, because it is important to design livestock or poultry housing appropriately depending on the local climate for each region and species or breeding environment of livestock or poultry and manage it accordingly.

For example, whereas it's permissible to close all the windows of livestock or poultry housing and raise livestock or poultry depending on the weather conditions such as heavy snow or strong wind, windowless livestock barn or poultry house are not permitted.

**(Q26-4) Is it permissible to use recycled compost as bedding in the livestock or poultry houses? Regarding the provision 5.1.1 -g) of JAS for Organic Livestock Products, which stipulates that “it must have a clean and dry earth floor”, what kind of situation does this mean specifically?**

(A26-4)

Yes, it's permissible to use recycled compost as bedding.

Whereas the surface of floor must be clean, as excessive dryness may have a negative impact on the growth of livestock depending on the species, such dry condition should be kept suitable for each species of livestock.

**(Q26-5) Whereas the pasture breeding in the open-air grazing area throughout the year is the basic management practice for livestock, should such minimum area of Housing (specified in Annex E-Table E.1 of JAS for Organic Livestock Products) be satisfied as well?**

(A26-5)

No, such livestock or poultry houses do not necessarily need to satisfy the minimum areas specified in Annex E-Table E.1 of JAS for Organic Livestock Products, in the cases where the pasture breeding in the open-air grazing area throughout the year is the basic management practice for livestock (for example, in the cases where livestock or poultry are raised without being allowed free access to open-air free runs in order to recover from disease or injury, or any other raising approaches without using livestock or poultry houses, excluding the emergency evacuation use of livestock or poultry houses)

However, in the case of raising livestock in the livestock houses for a limited period of time, e.g. final stage of fattening, such livestock houses must meet the criteria specified in Annex E-Table E.1 of JAS for Organic Livestock Products.

**(Q26-6) Is it permissible to raise poultry in the battery cages?**

(A26-6)

Poultry must be given outdoor access to pasture or open-air runs on a regular basis.

Should poultry be separated from the flock and pushed into battery cages, it would be considered insensitive to the behavioral needs of poultry.

So it is not permissible to raise poultry in battery cages, except in cases where there are valid reason to isolate sick or injured individual poultry to allow treatment or recuperation.

**(Q26-7) Is it permissible to breed livestock or poultry basically in the outdoor breeding area without providing livestock or poultry housing but a small shed as a night shelter (a small shed which is not used for breeding and in which animals and poultry are to be locked up at night for protection from predators)?**

(A26-7)

Should free movement of livestock or poultry be restricted even if such facility is used only for the temporary night shelter, requirements or criteria for livestock or poultry housing must be satisfied from a perspective of cattle breeding in consideration of physiological and behavioral needs of animals.

#### **(Related to Clause 5 (Open-air free runs))**

**(Q27-1) With reference to 5.2.1 -c) of JAS for Organic Livestock Products, which stipulates that “It must have standing trees, woods, or facilities that provide shelter from excessive rain, wind, sunlight and temperature, in case livestock or poultry are not allowed free access to the livestock or poultry housings”, do we have to provide such facilities, in case we temporarily prevent grazing animals from the free access to the housings for the purpose of cleaning or feeds preparation?**

(A27-1)

No, it is not always necessary to provide such facilities in the case of such management style, because it usually doesn't take much time to clean the house or to prepare for feeding, whereas this provision assumes that forest shelter or barn shelter should be available.

**(Q27-2) With reference to the “fields for growing perennial plants (other than pasture grasses)” specified in 5.2.1 -f) -1) of JAS for Organic Livestock Products, please clarify what situation is assumed here.**

(A27-2)

In addition to the cases of forage tree fields or sugarcane fields etc., we can assume a situation in which those fruits, that are produced in the orchards but are not destined for human consumption, may be fed to livestock as feeds.

**(Q27-3) With reference to the provision 5.2.1 -h) of JAS for Organic Livestock Products, which stipulates that “in the case of open-air runs for livestock or poultry specified in Annex F-Table F.1, it must have an area equal to or greater than the area specified in Table F.1 for each livestock or poultry”, does such number of livestock or poultry include only those that have free access to the open-air runs?**

(A27-3)

Based on the management principle that all the livestock or poultry held for breeding must have free access to open-air runs, it is appropriate to include the total number of livestock or poultry used in the organic livestock production.

**(Q27-4) In the case of “breeding sites that are covered by a roof and surrounded by wire fences to protect from the predators”, would such breeding sites be recognized as “open-air free runs”?**

(A27-4)

While it is necessary to make a decision based on comprehensive consideration of sunlight or outside temperature difference, such breeding sites may be recognized as “open-air free runs, provided that sunlight and ventilation are not blocked structurally.

**(Q27-5) What would happen if we mistakenly used prohibited materials and/or genetically modified seeds and seedlings in the open-air free runs?**

(A27-5)

As those open-air runs, where prohibited substances have been used, are not allowed for use in the organic



production, those cattle pastured there would not fall under the category of organic livestock products, unless such cattle have been pastured after a certain period of time since the prohibited substances were last used.

Additionally, provided that any seeds and seedlings produced by recombinant DNA technology were used in the relevant open-air runs, such open-air runs would not be permitted for use in the organic production until the elimination of such GMO crops from the relevant open-air runs is confirmed.

**(Q27-6) If we started cattle (excluding pigs) grazing in the newly cultivated fields or those not used for the agricultural purpose, where prohibited substances have not been used for 2 years or more, is it possible to reduce the duration specified in 5.2.1 -f) of 5.2 (Open-air runs) of JAS for Organic Livestock Products?**

(A27-6)

In the cases where home-grown feed for organic livestock is to be produced at the newly developed fields or those fields that have not been used for cultivation, such feed derived from the crops harvested in the fields may be considered as home-grown feed for organic livestock, if manure practice and noxious pest (animal and plant) control activities had been carried out without using prohibited substances for 1 year or more before the initial harvest of the relevant crops at the fields where perennial crops are cultivated, or for 1 year or more before planting seeds or seedlings at the fields where any other crops had been cultivated. For this reason,

In case cattle (excluding pigs) grazing started newly at such field where prohibited substances have not been used for two years or more (which is the same as in the case of the production of home-grown feed for organic livestock), it is possible to reduce the duration specified in 5.2.1 -f) of 5.2 (Open-air runs) of JAS for Organic Livestock Products

In case manure practice and noxious pest (animal and plant) control activities had been carried out for 1 year or more without using prohibited substances before the cattle grazing was initiated, such criteria specified in 5.2 (Open-air runs) of JAS for Organic Livestock Products would be satisfied.

In the case of grazing land, if prohibited substances had not been used for 3 years or more before the cattle grazing was initiated, such criteria specified in 5.2 (Open-air runs) of JAS for Organic Livestock Products would be satisfied.

#### **Related to Clause 5 (Domestic animals or poultry)**

**(Q28-1) In the cases where mother heifers had been treated with hormone at breeding and raised in the organic holding for 6 months or more after being converted to organic, would the calves born to such heifers considered to fall under the category of organic livestock products?**

(A28-1)

Yes, such calves fall under the category of organic livestock products.

**(Q28-2) With reference to 5.3.2 of JAS for Organic Livestock Products, which stipulates that “The poultry shall be raised organically after hatching”, is it permissible to use incubator to hatch eggs rather than the natural incubation by the parent birds?**

(A28-2)

Yes, it is permissible to use an incubator.

**(Q28-3) With reference to Annex G-Table G.1 (Conversion periods) of Organic Livestock Products, which stipulates that “From the third day after hatching to slaughter” specified in the Item “Meat-type poultry other than ostrich”, do you count the day of hatching as the “Day 0” or “Day 1”?**

(A28-3)

Please count the day of hatching as “Day 0”.

**(Q28-4) With reference to Annex I-Table I.1 (Requirements for external introduction) of JAS for Organic Livestock Products, which stipulates that “Less than 3 days of age” specified in the Item “Meat-type poultry”, does this mean the same as “less than three days after hatching?”**

(A28-4)

Yes, “less than three days of age” is synonymous with “less than three days after hatching.”

**(Q28-5) With reference to Annex I-Table I.1 (Requirements for external introduction) of JAS for Organic Livestock Products, which stipulates that “Less than 18 weeks of age” specified in the Item “Laying hens”, how many days of age does this mean?**

(A28-5)

As “18 weeks of age” normally refers to a situation where 18 weeks have passed, but 19 weeks have not passed after birth (of the relevant poultry), “less than 18 weeks of age” refers to an individual that is “younger than 126 days of age”.

## **Related to Clause 5 (Feeding)**

**(Q29-1) Is it permissible to use organic feeds produced overseas in the production of organic livestock products?**

(A29-1)

Yes, it is permissible to use such organic feeds produced overseas, (which includes those organic feed graded in accordance with JAS for organic feed, as well as those organic feed graded/certified by the organic equivalency countries in accordance with 5.44 of 5.4 (Feeding) of JAS for organic livestock Products in case it’s difficult to obtain organic feeds), as feeds for livestock in the production of organic livestock products.

**(Q29-2) In cases where the overseas production process managers produce organic livestock products, do they have to use the graded organic feeds? Even if they used the blended feeds that are processed by overseas production process managers themselves, is the grading still required for the ingredient plants and blended feeds?**

(A29-2)

Whereas those feeds purchased from external sources, as well as those in-house produced organic feeds are allowed for use in the organic livestock product production, those purchased feeds must be graded in compliance with JAS for Organic Feeds (including those feeds graded by equivalency countries, as mentioned in the previous (Q29-1)).

However, in the cases where production process managers of organic livestock products produce plant feedstuffs by and mix the feeds themselves in accordance with the provisions specified in the JAS for Organic Livestock Products, such grading is not required for the relevant plant feedstuffs and mixed feeds. Please note that this also applies to overseas production process managers.

**(Q29-3) Please tell us what additives are permitted or prohibited for use as feed additives.**

(A29-3)

Only those substances that satisfy the component criteria or manufacturing standards specified in the feed additives designated by the Minister of Agriculture, Forestry and Fisheries in accordance with the provisions under the Act on Safety Assurance and Quality Improvement of Feeds (Act No.35 of 1953), are allowed for use as feed additives.

Among those substances, any antibiotics or those produced by using recombinant DNA technology are not allowed for use as additives in organic feeds, even if such substances were natural substances or those derived from natural substances. Other than those additives may be used, provided that they are natural substances or those derived from natural substances, and that they have not undergone chemical treatment. Furthermore, with regard to dietary supplement such as amino acids, vitamins, and minerals, that are used for supplementing nutrients or other active ingredients in feeds, similar substances, such as refined vitamins and chemically treated minerals may be used, in the cases where any natural substances or those derived from natural substances are not being produced, or in the cases where such substances are being produced but is too expensive to be used in feeds.

In the cases where it is difficult to obtain such feeds intended for supplementing minerals, that are natural substances or are not chemically treated and derived from natural substances, production process managers for organic livestock products may provide by themselves such feed additives for supplementing minerals.

**(Q29-4) Provided that the provisions specified in the Act on Safety Assurance and Quality Improvement of Feeds (Act No. 35 issued in 1953) be satisfied, would any chemically synthesized substances or genetically modified feed additives be allowed for use as ingredients for organic feeds?**

(A29-4)

Basically it would not be permissible to use any chemically synthesized substances or genetically modified feed additives, as ingredients for organic feeds.

However, it would be permissible to use such substances (e.g. Chemically synthesized pH adjuster, glucose derived genetically modified corn) for the materials for cultural medium, in the cases where they are essential and unavoidable for the growth of the relevant microorganisms in the production of such feed additives derived from microorganisms (e.g.: probiotics, enzyme).

**(Q29-5) Is it permissible to give iron to the iron-deficient piglets during the lactation period be permitted?**

(A29-5)

It would be permissible to provide such substances to them with the aim of replenishing minerals.

However, the administration of veterinary iron drugs by intramuscular injections, etc. is not allowed for a purpose other than medical treatment.

**(Q29-6) With reference to the provision that “feeds other than those specified may be provided up to the ratio specified by the criteria 1)(15%) or 2)(20%) only for a certain period when necessary amount of feeds for organic livestock cannot be provided in case that feeds for organic livestock are difficult to obtain”, which is specified in 5.4.5 of JAS for Organic Livestock Products, whereas the purchased organic feeds may contain 5% or less non-organic ingredients, how should we calculate such figures as 15% or 20% specified in this provision?**

(A29-6)

Such purchased organic graded feeds, including 5% or less non-organic ingredients, are considered to be organic feeds in its entirety. Consequently, such amount of non-organic feeds permitted during the transition period should be no more than the amount obtained by applying such ratio as 15% or 20% to the average intake amount (excluding mineral feed supplements, feed additives, fish meal, algae, enzymes and microorganisms).

**(Q29-7) Regarding the percentage calculation (such as “50%”) specified in 5.4.3 of JAS for Organic Livestock Products, based on which unit of measurement (day, month, year, or lifetime) should we calculate such ratio?**

(A29-7)

Please calculate such ratio on an approximately monthly basis because it may vary depending on the day.

**(Q29-8) As the provision 5.4.5 of JAS for Organic Livestock Products stipulates that “in the cases where it is difficult to obtain livestock feeds, feeds other than those specified in 5.4.1~5.4.4 may be used only for a period of time until the necessary amount of organic feeds can be used, provided that the utilization ratio be kept under the criteria 1)(15%) or 2)(20%) of the average feed intake”, does this provision (“difficult situations”) apply to the cases where we could not produce feeds by ourselves even though we wish to do so?**

(A29-8)

This provision (for “difficult situations”) may also apply to the cases where “grazing fields are not available” or “it’s not possible to purchase organic feeds”, because organic feeds (to be it is not possible to immediately start used as feed) are currently in short supply in the market and it is not possible to immediately start in-house production of such feeds for organic livestock.

However, it would be necessary to provide feeds without relying on this special provision, as soon as possible.

## **Related to Clause 5 (Health Control)**

**(Q30-1) Is it permissible to put magnets in the cow's stomach to prevent pericarditis caused by the accidental ingestion of needles or steel wires?**

(A30-1)

Yes, it's permissible, because this is an appropriate measure taken to prevent the livestock's accidental ingestion of needles, without using any veterinary drugs.

**(Q30-2) Would the mastitis ointment for dry or non-lactating periods be allowed for use?**

(A30-2)

No, the use of mastitis ointment for dry periods is not allowed for use, because such veterinary drugs containing antibiotics are to be used for the purpose of preventing diseases.

**(Q30-3) As the provision 5.5.6 of JAS for Organic Livestock Products stipulates that "Substances for the stimulation of growth and/or production except for feeds shall not be provided", what kind of substances are not allowed for use?**

(A30-3)

For example, hormone drugs for stimulating fattening and artificial fiber substitutes for ruminant livestock are not allowed for use.

#### **Related to Clause 5 (General Management)**

**(Q31-1) As the provision 5.2.1 – d) of JAS for Organic Livestock Products stipulates that "It must have a field etc. in the case of an open-air runs for livestock (excluding porcine livestock)," should such "fields" etc. be covered with vegetation such as grass etc.? Or would straw-bedded exercise area also be acceptable?**

(A31-1)

"Field, etc." mentioned in 5.2.1 – d) is defined as fields and grass-collection pastures, that are covered with vegetation such as pasture grass.

**(Q31-2) What do you mean by "pasturing"?**

(A31-2)

Whereas "pasturing" means to send out livestock to grass for the purpose of feeding fresh forage in the case of herbivores, it means to send out livestock to outdoor exercise area for the purpose of exercise in the case of non-herbivores.

**(Q31-3) Even in the case where poultry is prevented from the free access to the open-air free runs, could such poultry be recognized as being organically raised, provided that such poultry be pastured in open-air free runs twice or more a week?**

(A31-2)

Whereas outdoor poultry farming management falls under the category of pasturing poultry, in the cases where poultry is prevented from the free access to the open-air free runs, if such poultry were pastured in open-air free runs twice or more a week, such raising method would be recognized as conforming to 5.6 (General Management) of JAS for Organic Livestock Products.

On the other hand, in the case of aviary housing system (for poultry) where poultry can move freely, it's not necessary to pasture poultry twice or more a week.

**(Q31-4) Is it permissible to raise calves in the calf hutches?**

(A31-4)

Yes, a calf hatch may be used until calves are around two months of age for the purpose of preventing calf diseases.

**(Q31-5) With reference to 5.6.1 of JAS for Organic Livestock Products, which stipulates that “...grazed ... “twice or more a week”, how many hours does it take for each grazing time?**

(A31-5)

Regarding grazing hours, whereas it would be difficult to adopt common standards, because milking frequency or distance between livestock barn and playground may be different depending on the management style, or appropriate grazing hours may be different depending on pasture condition or state of livestock health, approaches for the determination of appropriate grazing hours may be as shown below.

- Such grazing time should be based on the time difference between sunrise to sunset
- In the cases where such grazing time is subject to the restriction of geographical features or climatic conditions, breeding methodology or breeding environment of each producer, etc., it would be necessary to clearly specify the reasons for such restrictions.

(e.g.: In the cases where livestock or poultry can be put out on pasture early in the morning or in the evening, livestock or poultry may be at a risk to freezing temperature.)

**(Q31-6) With reference to 5.6.3 of JAS for Organic Livestock Products, which stipulates that “no one is allowed to intentionally cause physical harm to the livestock or poultry”, what should be taken into consideration to perform such operations specified here?**

(A31-6)

It would be permissible to injure livestock or poultry only in the following cases.

(1) Measures taken for the health and safety of livestock or poultry. Examples are as follows.

Beak trimming, tail docking, dehorning, tooth extraction, removal of poultry spurs, installation of nose rings, hoof trimming, installation of horseshoes, curative treatment, measures taken for physical examination and other health checks, and vaccination against infectious diseases.

(2) Measures taken to identify individual livestock

(e.g.) Application of ear tags or ear notches

(3) Surgical castration,

In the cases where above measures are taken, it is necessary to take such measures at the most appropriate time so as to minimize the stress and pain of the relevant livestock or poultry. So, the following should be considered.

- a) As long as the same goal is achieved, choose the least painful measures (for the livestock or poultry).
- b) take care of any injuries or damages appropriately, after the above measures are taken
- c) Surgical castration must be carried out at as young an age as possible.

When such measures are to be taken, as regards the implementation timing and methods, it would be necessary to clarify the reason why such measures are considered as appropriate and implement those measures accordingly, in consideration of livestock species or breed difference.

**(Q31-7) Is forced molting permitted?**

(A31-7)

No, it is not permissible to induce molting by withholding feed, because “livestock are allowed free access to feed and fresh water”, as specified in 5.1.1 – a) of JAS for Organic Livestock Products.

**(Q31-8) With reference to the cleaning agent and disinfectants for milking facility specified in 5.6.8 and Table D.1 of JAS for Organic livestock Products, does this list of substances include all the dairy detergents and disinfectants permitted under the Food Sanitation Act?**

(A31-8)

Yes, it does. Note that control measures (e.g. rinse thoroughly with clean water after using cleaning agents, etc.) must be put in place to protect organic livestock products from contamination.

**(Q31-9) In the cases where seedstock cattle for breeding have not been raised organically, is it permissible to graze such cattle on the organic breeding farms as a stud for breeding?**

(A31-9)

Seedstock cattle may be used for breeding immediately after being introduced into the farm without going through conversion period.

Whereas it is necessary to prevent the organically raised livestock from contacting the prohibited

substances, it must go through a defined conversion period, in the cases where the relevant seedstock cattle are used in the production of the organic livestock products such as meat.

**(Q31-10) Is it permissible to use rodenticides?**

(A31-10)

Whereas the rodenticides are allowed for use in the livestock barn or poultry house, it must be managed in such a way as to prevent livestock or poultry from coming in contact with or ingesting such rodenticides. However, the rodenticides are allowed for use in the management for slaughtering, dismantling, selection, preparation, washing, storage, packaging and other processes.

**Related to Clause 5 (Management concerning slaughter, dressing, selection, processing, cleaning, storage, packaging, and other processes)**

**(Q32-1) How can we distinguish organic beef cattle from other types of bovine livestock at the slaughterhouses?**

(A32-1)

As it is necessary to prevent commingling of organic livestock products and other (non-organic) livestock products, such controls must be put into place, including establishing specialized lines or specific time slots for processing only organically raised cattle.

**(Q32-2) With reference to 5.72 of JAS for Organic Livestock Products, which stipulates that “The slaughter of domestic animals or poultry is undertaken in a manner which minimize stress and suffering by producing loss of consciousness as much as possible”, what kind of efforts are required specifically in order to take such measures?**

(A32-2)

With regard to “the way to minimize stress and suffering” at slaughter, although it is difficult to establish uniform provisions because it depends on the species of livestock or conditions of livestock farm, it would be necessary to take the following measures depending on the actual situation of each slaughterhouse or poultry slaughterhouse.

- a) The space and time should be provided for livestock or poultry, after they are brought to the slaughterhouse or poultry slaughterhouse.
- b) Blood or carcasses should not be processed in the sight of other livestock or poultry before slaughter as far as possible
- c) Use the stunning methods that likely to cause least stress and pain, etc.

**(Q32-3) Regarding the process of cutting dressed carcasses into meat cuts, is it permissible for the production process managers to obtain a unified certification for the whole production process and carry out this process as well?**

(A32-3)

As a general rule, as regards the process of processing dressed carcasses into meat cuts, they need to obtain certification for re-packers separately.

However, in the cases where both processes of slaughtering and processing dressed carcasses into meat cuts are carried out by the same operator, it would be permissible to certify such operator as a single production process manager in a unified way.

On the other hand, in the cases where cattle fattening farmers are to manage or understand the production process of the relevant livestock products, and grade the relevant livestock products accordingly, it would be permissible to contract out such process of slaughtering and cutting carcasses into meat cuts to a third-party service provider and manage it accordingly.

**(Q32-4) With reference to the organic JAS certified overseas production process managers of organic livestock, isn't it possible for the certified slaughterers to produce and sell organic livestock products if they don't slaughter organic JAS certified livestock or poultry bearing organic JAS seal?**

(A32-4)

Regarding the organic plant products, organic livestock products and organic processed foods, that are certified based on the national system of the countries that are designated by Order of the Competent Ministry as having the equivalent grading system in accordance with the provision specified in Article 12 – (2) of Act on JAS, and the relevant country's organic equivalency arrangement with Japan, it is permissible for the certified importers to affix organic JAS seals to those certified organic products, should they be imported to Japan, because the production standards of such products or handling in distribution of such products (in the relevant foreign countries) are considered equivalent to organic JAS certified plant products/livestock products/processed foods.

For this reason,

If the slaughter operators, who are located in “the countries that are designated by Order of the Competent Ministry as having the equivalent grading system in accordance with the provision specified in Article 12 – (2) of Act on JAS,” were holding organic JAS certification for the overseas production process manager of organic livestock products, it would be permissible for them to use graded livestock/poultry (graded in accordance with the relevant country's organic system) for their production and manage the relevant production processes such as slaughtering, dismantling, selection, preparation, washing, storage, packaging, and other processes.

However, such livestock/poultry are allowed for use within the scope of the relevant organic equivalency arrangement.

#### 4. JAS for Organic Feeds

**(Q33-1) Is it permissible for the production process managers of organic plant products to ship rice straw (generated from the organic rice production) as organic feeds?**

(A33-1)

In this case, such certified production process managers of organic plant products must also become certified for organic feeds and grade the rice straw as organic feeds, as the production process managers of organic plant products are allowed to grade only food and beverage products.

Besides the by-products generated from the plant products production at the organic certified fields, the same applies to the cases where such residues or by-products generated from the production/processing process of organic processed foods. So, such certified production process managers of organic plant products must also become certified for organic feeds and grade them as organic feeds accordingly.

On the other hand, it would be easier for those operators (who have already obtained certification for organic plant products, etc.) to obtain certification for organic feeds as well, because the “Certification Technical Criteria” of both agricultural and forestry products are unified, since the production process of organic plant products or organic processed foods and that of the organic feeds produced from their residues or by-products are the same.

If such operators are to apply for the relevant certification at the same time, they can obtain certification for both organic plant products etc. and organic feeds, undergoing only one examination for overlapping test items.

However, in the cases where livestock farmers partnered with rice farmers and obtained certification in an integrated manner, it would be permissible for the relevant livestock farmers to use such rice straws, etc., that have been generated from the organic rice production carried by the relevant rice farmers, as self-produced feeds for organic livestock, without grading such straws etc. as organic feeds.

**(Q33-2) In case we are to ship the organic plant products to organic livestock farmers as feeds, since their sizes and shapes do not satisfy the shipment standards even though we produced them to be shipped as organic products, is it permissible for us to grade such products as organic plant products?**

(A33-2)

Whereas organic plant products are defined as being limited to food & beverage products in accordance

with JAS for Organic Plant Products, it is permissible to consider such plant products as food & beverage, even though their shapes or sizes are not in conformity with the shipment criteria, and grade them as organic plants.

**(Q33-3) Is it permissible to use any organic feeds produced overseas as ingredients for organic feed production?**

(A33-3)

Yes, in addition to the organic JAS certified foods, such feed certified by the organic equivalency countries specified in 3.9 of JAS for Organic Feed may be used as ingredients for the organic feed produced overseas, if it is difficult to obtain such JAS certified organic feed.

**(Q33-4) Just like the organic plant products, is it possible to import such organic feeds (that are certified under the relevant foreign country's organic system), affix organic JAS seal to them and sell them as organic?**

(A33-4)

Apart from the organic plant products that can be affixed with organic JAS seals based on the relevant certificate issued by the relevant foreign government, there are not any mechanisms available for organic feeds to confirm organic equivalency with Japan. So, it is not possible to certify the importers of organic feeds.

Furthermore, it is not permissible for the certified importers of organic plant products or organic processed foods to import such organic feeds (that are certified under the relevant foreign country's organic system), affix organic JAS seal to them and sell them as organic.

**(Q33-5) Whereas two standards are available for the technical criteria for certifying production process managers of organic feeds (one is "limited to those...undergone only the process of...." and the other is "limited to those...undergone the processes other than preparation or ....."), which one should be applied to the cases where hay or silage is to be produced? Are we allowed to affix organic JAS seal and sell them?**

(A33-5)

Such Technical Criteria as "Limited to those that have undergone the processes other than preparation or sorting process" shall be applied to the cases where hay or silage is to be produced.

However, in the cases where the operator is growing grass in the field and produce hay or silage, both Technical Certification Criteria must be satisfied.

Even in the cases where the certification is based on two technical criteria, only one certificate shall be issued, since such certificate is to be issued for each type of agricultural and forestry product.

**(Q33-6) Are there any provisions applicable to prevention of commingling and contamination in transportation and storage of the relevant organic feeds?**

(A33-6)

Please refer to the provisions of Article 41-1 of Act on JAS and Article 78 of the Regulations for the Enforcement of Act on JAS, which stipulate the relevant agricultural and forestry products as well as the basis for non-conformity to the JAS.

Should the organic feed be mixed with or contaminated with prohibited substances or commingled with feeds other than organic feeds, in transportation and storage of the relevant organic feeds, it is necessary to remove or delete grade labels in accordance with these provisions.

## VI Labelling & Display

**(Q34-1) Is it permissible to display the term "Organic farming practices" on the plant products bearing no organic JAS seal or to display the term "Organic ingredients are used" on the processed foods?**

(A34-1)

1. Regarding the labeling of plant products and livestock products, such product must be labeled with the name (common names indicating the product description) and country of origin in accordance with Food



Labeling Standards (Cabinet Office Ordinance No.10 of March 20, 2015).

In the cases where any other name labels or highlighted labels are used additionally, it's not permissible to use misleading terms (that may be misinterpreted as "organic plant products" or "organic livestock products") in the labeling of plant products and livestock products.

On the other hand, other than the above common names, it's permissible to use such term as "Organic fertilizer was used as fertilizer", which highlights the cultivation process etc.

1) Prohibited labeling examples, in the cases where organic JAS seals are not affixed to the products

2) Permitted labeling examples, in the cases where organic JAS seals are not affixed to the products

However, should such overly highlighted term as "Organic fertilizer used" on the labels mislead the customers to believe that the relevant plant product by itself is made by the organic method, such labeling could violate the labeling regulations.

2. Regarding the labeling of Processed Foods, product name as well as ingredient materials etc. must be displayed on the labels in accordance with Food Labeling Standards.

Besides, in the cases where any highlighted labels are applied to the processed foods bearing no organic JAS seals, it's not permissible to use misleading terms that may be misinterpreted as "organic processed foods".

On the other hand, it's permissible to include such description indicating that organic plant products, organic livestock products and organic algae (Organic JAS seals must be affixed to organic plant products and organic livestock products) are used as ingredients, in accordance with Food Labeling Standards. (In such case, should the usage ratio of the relevant organic plant/livestock products as ingredients be less than 100%, each usage ratio of the relevant organic plant products, organic livestock products or organic algae must be displayed on the label.

1) Prohibited labeling examples, in the cases where organic JAS seals are not affixed to the products

2) Permitted labeling examples, in the cases where organic JAS seals are not affixed to the products but organic products bearing organic JAS seals are used as ingredients.

<b>(Q34-2) Is it permissible to label the product as "organic tomatoes with no chemicals"?</b>
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(A34-2)

Such labeling is not appropriate, in consideration of the fact that such labeling as "With No Agricultural Chemicals" is prohibited under the Guidelines for the Labeling of Specially Cultivated Agricultural Products, which was revised in May 2003 in order to avoid giving consumers false beliefs (e.g. they may misinterpret it ("With No Agricultural Chemicals") as "With No Agricultural Chemical Residue"). Furthermore, since organic plant products must be labeled in accordance with the labeling methods specified in the relevant Standard, such labeling as "Organic Tomatoes with No Agricultural Chemicals" is not permitted.

<b>(Q34-3) Would such labeling as "organic rice" or "organically cultivated rice" comply with the Food Labeling Standards (Cabinet Office Ordinance No. 10 of March 20, 2015)</b>
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(A34-3)

No, according to Appended Table 24 of Food Labeling Standard, names of brown rice and polished rice etc. should be labeled as "Brown Rice" for brown rice, "*Mochi* Polished Rice" for *Mochi* polished rice, and "*Uruchi* Polished Rice" for *Uruchi* polished rice respectively. Therefore, whereas organic plant products must be labeled as "Rice (Organic Plant Products)", "Organically Cultivated Rice", "Rice (Organic)" etc. in accordance with the provisions specified in JAS for Organic Plant Products.

Therefore, in the cases where such product name is to be displayed in the Name Field of the designated Summary Information Display Area on the labels in accordance with JAS provisions, you need to satisfy labeling requirements of both JAS for Organic Plant Products and Food Labeling Standard, and label the relevant products as "Organic *Uruchi* Polished Rice" or "Organic Polished Rice" rather than "Organic Rice" or "Organic Cultivated Rice".

However, in the cases where such product name is to be displayed on other part of the label other than the designated Summary Information Display Area, you may label the relevant products as "Organic Rice", "Organic Cultivated Rice", "Rice (Organic)", "Organic Polished Rice" etc.

<b>(Q34-4) Is it permissible to display only the product names on the label in order to satisfy the labelling requirements for the organic plant products or organic livestock products?</b>
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(A34-4)

No, as regards the labeling of organic plant products or organic livestock products, you also need to display the product name and country of origin in accordance with Article 18-(1) or Article 24-(1) of Food Labeling Standards (Cabinet Office Ordinance No. 10 of March 20, 2015), in addition to the product name displayed in accordance with the labeling requirements specified in Clause 6 of JAS for Organic Products of Plant Origin or Clause 6 of JAS for Organic Livestock Products.

So, in the cases where the relevant product is labeled as “Organic Plant Product” in accordance with the provisions specified in Clause 6 of JAS for Organic Products of Plant Origin or “Organic Livestock Product” in accordance with the provisions specified in Clause 6 of JAS for Organic Livestock Products, you also need to display the common name of the relevant plant products or livestock products such as “Tomato” or “Beef” in accordance with Food Labeling Standards.

**(Q34-5) Is it permissible to display only the names of the products and ingredients on the label in order to satisfy the labelling requirements for the organic processed foods?**

(A34-5)

Organic Processed Foods must be labeled in accordance with the labeling requirements specified in Food Labeling Standards (Cabinet Office Ordinance No. 10 of March 20, 2015) and Act on Securing of Liquor Tax and on Liquor Business Associations (Act No. 7 of 1953) as well as Clause 6 of JAS for Organic Processed Foods.

Product name of the Organic Processed Foods is to be displayed on the labels in accordance with any of the examples specified in Clause 6 of JAS for Organic Processed Foods.

Ingredients of the product are to be displayed on the labels as “Organic XX” etc. and “Organic In-conversion XX” for organic in-conversion plant products etc. (Common names of the relevant foods is to be entered in XX), as specified in Clause 6 of JAS for Organic Processed Foods.

On the other hand, in the cases where the importers, who imported organic foods certified by the overseas production process managers etc., are to label the relevant products in accordance with Food Labeling Standards, it’s permissible for the relevant importers to display the product name and ingredient names in accordance with JAS for organic processed foods on behalf of the relevant overseas production process managers etc.

**(Q34-6) How should the monitoring for the organic plant products be done?**

(A34-6)

As regards the organic plant products distributed in the market, Regional Agricultural Administration Offices, their Prefectural Administration Offices, or Food and Agricultural Materials Inspection Center (FAMIC) conduct such monitoring on a daily basis.

**(Q34-7) Would organic food label regulations apply to the food service industry or Home Meal Replacement (HMR) industry?**

(A34-7)

Yes, organic food label regulations would be applied to the food service industry or home meal replacement industry as well, in the cases where the relevant foods (e.g. takeout foods purchased by the consumers) are being labeled as organic etc. and sold to the consumers.

Besides, flyers, menus, and banners, that provide consumers with the related information, are not subject to such label regulations but may be subject to the regulations under the Act against Unjustifiable Premiums and Misleading Representations.

**(Q34-8) If producers are to sell their plant products (produced in accordance with Japanese Agricultural Standards) directly to the consumers, through collaboration between producer and consumer, should we obtain production process manager certification?**

(A34-8)

Even in the case of collaboration between producer and consumer, such producers need to obtain certification for Production Process Managers of Organic Plant Products, if they are to label and sell their plant products as organic.

However, in the case of collaboration between producer and consumer, which is a kind of sales approach based on the special trusting relationship between producer and consumer, it can be assumed that a wide

range of information about the production should be disclosed or exchanged before or at the time of purchasing the products.

As such being the case, even if their products were not labeled as organic, there should not be any problems, since a wide range of information about the production situation (e.g. such products have been produced in accordance with JAS for organic plant products) has already been disclosed.

Besides, any (display of printing) other than those displayed on the products and their containers or invoices, such as brochures providing information about the relevant products, order sheets, etc., may not be subject to the (labeling) regulations.

1. Display of labels that are subject to the regulations.

- (1) Organic labeling seals affixed to the designated agricultural and forestry products.
- (2) Organic labels affixed to the designated agricultural and forestry products, their containers, packages, or invoices (meaning delivery slip, or statement of account, etc. that are issued and accompany the commodities. The same applies hereinafter.).
- (3) Organic display on the signpost, indicating that the displayed designated agricultural and forestry products are organic.

2. Information to be provided, that are not subject to the (labeling) regulations.

- (1) Explanatory text posted on the mass media such as newspapers, magazines, internet, etc. such as explanation for handling organic plant products (including those posting pictures/illustrations as well as explaining that they are organic)
- (2) The same (as above (1)) or similar explanation text displayed on the flyers, brochures, newsletters, or signboards.
- (3) Descriptions (including pictures or illustrations) presented on the order information flyers of the products (to be supplied next week), that indicates which one is organic.
- (4) Description presented on the order sheets, that indicates which is organic.
- (5) Explanatory documents such as newsletters, etc. inserted in the packaging box for vegetables (which is to be delivered after the customer made a choice), that shows which is organic vegetable.

**(Q34-9) In case we produce “natto” (fermented soybeans) from organic JAS-certified soybeans and sell them under such label as “natto (organic-soybean-used)” without Organic JAS logos, is it permissible to display “Organic Natto” on the signpost for such sales?**

(A34-9)

No, it's not permissible to display “Organic Natto” on the signpost, because Organic display on the signpost, indicating that the displayed designated agricultural and forestry products are organic, is subject to the labeling regulations, as mentioned in the above (A34-8)-1.

**(Q34-10) In case we obtain milk from the cows that are still in the process of conversion to organic farming, is it permissible to label it as “under conversion to organic”?**

(A34-10)

No, it's not permissible to label the livestock products or processed foods as “in-conversion products”.

**(Q34-11) In case where organic plant products and “in-conversion organic plant products” were mixed, how should we label them?**

(A34-11)

You should label them as “in-conversion” in such case.

In the cases where both organic plant products and “in-conversion organic plant products” are used as ingredients for the organic processed foods, such finished products should be labeled as “in-conversion organic XX products” or “organic XX products (in-conversion)”, or “in-conversion” should be displayed adjacent to the name or product name on the labels. In the cases where “in-conversion” is displayed adjacent to the name or product name on the labels, name of the product may be described as “organic XX”.

**(Q34-12) Is it permissible to use a stamp to imprint the organic JAS seals? Or is it permissible for certified operators to use their own personal-computer-generated organic JAS seal images?**

(A34-12)

It's necessary to strictly control and keep a tally of the number of the Organic JAS Seals affixed to the products. It would be permissible to use a stamp to imprint the organic JAS logo, if it's possible to control

the number of uses properly and prove it.

It would also be permissible to use their own personal-computer-generated organic JAS logo images, if it is possible to control the number of creation and uses of such JAS logo images properly and prove it.

**(Q34-13) Is it permissible to display such words as “organic XX used” on the labels of fresh produce, without affixing Organic JAS seals to such produce?**

(A34-13)

1. In the cases where the relevant processed foods are produced by using distinctive ingredients such as organic plant products etc., it's permissible to label the product as “organic XX are used”, showing that the relevant ingredients are organic, as specified in Food Labeling Standard. Because it is recognized that the consumers would not misunderstand it and that the consumers may not have difficulty making choices, as the ingredients and the finished products are different (e.g. Soybeans and Tofu, their finished products), that's why such labeling is permitted.

2. On the other hand, whereas such labeling provision is not available under Food Labeling Standard, as the fresh foods are not something that are produced by manufacturing or processing in the first place, provided that the organic plant products or organic livestock products are simply re-packed without undergoing manufacturing or processing steps and labeled as “organic XX are used”, consumers may misunderstand it as “Organic” even if “Used” is displayed on the label, since the ingredients and the re-packed products are clearly the same thing.

So, such labeling is not permitted, as it falls under the category of “confusingly similar labeling” specified in Article 63-(2) of Act on JAS.

Additionally, organic algae are excluded from the above, as the labeling regulations would not be applicable, however, be careful not to put consumers at an unfair disadvantage.

3. On the other hand, even those categorized as “Fresh Foods” may be labeled as “Organic XX used” based on facts, provided that their ingredients and the produced foods are totally different type of foods (e.g. bean sprouts grown from organic mung beans, etc.) and that there's no risk of consumers' misunderstanding.

However, in cases where the usage ratio of plant products graded under the organic JAS is not 100% in accordance with Food Labeling Standard, it's necessary to display the usage ratio as well, such as “Organic XX 50%”.

**(Q34-14) In case where we are to ship processed foods bearing organic JAS seal being packaged in a cardboard box with an indication of “organic XX”, is it necessary to attach Organic JAS seals to the cardboard boxes as well?**

(A34-14)

If you are to re-pack the packaged commodities, (which is individually packaged, affixed with organic JAS seals, and ready for sale to consumers) in a cardboard etc. for transportation and ship them, it's possible to display “Organic” etc. on the cardboard boxes etc. without affixing organic JAS seals, in order to verify that the content of the cardboard package is organic processed foods.

**(Q34-15) Is it permissible to display such labeling name as “organic rooibos tea” on a free product sample without affixing organic JAS seal to such sample?**

(A34-15)

No, even in the case of a free product sample, it's not permissible to label it as “Organic” etc. without organic JAS seals, because regardless of whether it's for sale or for gift, “it is prohibited for any person to affix the label of the name provided for by the Japanese Agricultural Standards regarding the specified agricultural and forestry products or a confusingly similar label to any agricultural and forestry products other than for specified agricultural and forestry product” under Article 63 -(1) & (2) of Act on JAS.

**(Q34-16) With reference to the certification numbers displayed on the organic JAS seals, in case the accredited certification bodies put the certification-wise numbers or in case certified operators put the numbers on the organic JAS seals, is there anything we should be aware of?**

(A34-16)

1. As long as it's possible to identify the relevant certified operators so as to take the appropriate measure in accordance with the relevant certified operator's situation, in case there's any inquiries about the graded

products after shipment or any non-conformity was found therein, it doesn't matter how the accredited certification bodies put the certification numbers or how the certified operators describe their certification numbers.

2. It would also be possible for the accredited certification bodies to put the certification numbers in the following ways, for example.

(1) In the cases where one operator holds multiple certifications (e.g. certifications for importers and re-packers of organic plant products), the accredited certification bodies may assign the same certification number to such certified operators. number or separate certification number for each certification.

(2) In the case of a group of certified operators, who may sell their products jointly, the accredited certification bodies may assign suffix numbers or sub-numbers (e.g. No.100-1 for certified operator-A and No.100-2 for certified operator-B) to their certified group operators.

3. It would also be possible for the certified operators to put the certification numbers on their products in the following ways, for example.

(1) In the cases where the relevant certified operator obtained certifications for both importers and re-packers of the organic plant products from the accredited certification bodies, such certified operator may put two certification numbers or only one certification number on their products.

(2) In the cases where the accredited certification bodies assign such numbers as No.100-1 for the certified operator-A and No.100-2 for the certified operator-B and these two certified operators are jointly conducting their sales activities etc. and they are also prepared to jointly respond to inquiries etc. about the graded products after shipment, such certified operators A and B may put their certification No.100 on their products (in such cases, if any non-conformities were found in the graded products of the certified operator-A after shipment, it would be necessary to follow up with the graded products of both certified operators A and B, unless there is any specific information (except for the certification numbers) that can be used to identify the relevant certified operator).

**(Q34-17) Whereas “the Labeling Standard for Organic Materials in Alcohol Beverage (NTA Notice No.7 of 2000)” shall be repealed, how would the 2022 amended Act on JAS be applied to the products that have been labeled as “Organic Alcohol Beverages of plant and livestock origin etc.” so far in accordance with this labeling standard? What about the processed foods which have been produced from such alcohol beverages as their ingredients?**

(A34-17)

According to Supplementary Provision-3) of NTA Notice No.32 of 2022 regarding the repeal of organic labeling standard provisions for alcohol beverages, as a transitional measure, it is stipulated that the repealed standards continue to apply for 3 years from the enforcement date of amended Act on JAS.

In such a case, those alcohol beverage producers, who have been displaying “Organic Processed Alcohol Beverages of plant and livestock origin” etc. on the labels in accordance with the repealed standards, may continue to label their products in the same manner but may not affix organic JAS seals to their products.

In the case of organic JAS certified alcohol beverages, which have been certified by accredited certification bodies in accordance with amended Act on JAS beforehand and are affixed with graded labels (such graded labels are affixed to the relevant products, or their packaging or invoices), it's possible to label them as “有機” or “オーガニック”, bearing Organic JAS seals, as the repealed standards are not applied but such labeling rules in accordance with amended Act on JAS are applied.

On the other hand, based on the Cabinet Order on the Arrangement of the Relevant Acts incidental to Enforcement of the Act amending the Act on Facilitating the Export of Agricultural, Forestry, and Fishery Products and Food (Cabinet Order No.279 of 2022), provisions specified in Article 63 of amended Act on JAS will not apply. So, even in the cases where the relevant products were labeled as “有機” or “オーガニック” during the period from Oct. 1, 2022, to Sept. 30, 2025, based on the repealed standards, regulations based on the amended Act on JAS would not apply.

So, it's not permissible to affix organic JAS seals to those processed foods (those ingredients other than alcohol beverages have been produced in accordance with JAS for organic processed foods, and the usage ratio of such ingredients other than organic JAS certified products is more than 5%), that are produced by using such alcohol beverages for ingredients, but it may be permissible to label them as “有機” or “オーガニック” during the period from Oct. 1, 2022, to Sept. 30, 2025, provided that the usage ratio of such organic alcohol beverages be displayed as well on the label.

**(Q34-18) Whereas we are now considering producing organic alcohol beverages newly, after the 2022 amended Act on JAS came into force, is it possible to label them as “Organic Processed Alcohol Beverages of plant and livestock Origin” etc. in accordance with the transitional measures accompanying the repeal of Labeling Standard for Organic Materials in Alcohol Beverage (NTA Notice No.32 of 2022)?**

(A34-18)

NTA Notice No.32 of 2022 regarding the repeal of organic labeling standard provisions for alcohol beverages shall apply from the enforcement date of amended Act on JAS (Oct. 1, 2022).

However, with a view to reducing the impacts on the alcohol beverage producers, who are labeling their products based on the repealed standards, it is permissible to apply such repealed standards for three years from the enforcement date of amended Act on JAS (as specified in Supplementary Provision-3) of NTA Notice No.32 of 2022), in the cases where such alcohol beverages are shipped out from the production site or received from the bonded area, or shipped from store (excluding those alcohol beverages for export), on or after the enforcement date of amended Act on JAS.

As this transitional measure may apply to the alcohol beverage producers, who intend to newly start production of organic alcohol beverages after the amended Act on JAS came into force, it is permissible to display “Organic Processed Alcohol Beverages of plant and livestock origin” etc. on the labels in accordance with the repealed standards.

However, as this transitional measure is applicable only for three years from the enforcement date of the amended Act on JAS (until Sept. 30, 2025) even in this case, we would recommend that you shift to the grade labeling based on the amended Act on JAS at an early stage.

**(Q34-19) In the cases where the organic alcohol beverages are affixed with organic JAS seals and labeled as organic in accordance with JAS for organic processed foods, is it also necessary for us to label them as “Organic Processed Alcohol Beverages of plant and livestock Origin” etc. in accordance with the Labeling Standard for Organic Materials in Alcohol Beverage (NTA Notice No.7 of 2000)?**

(A34-19)

No, it's not necessary to label them as “Organic Processed Alcohol Beverages of plant and livestock Origin” etc. in accordance with the Labeling Standard for Organic Materials in Alcohol Beverage, in the cases where the organic alcohol beverages are affixed with organic JAS seals and labeled as organic in accordance with JAS for organic processed foods.

**(Q34-20) In the cases where both representation names are to be displayed on the labels of the alcohol beverages in accordance with both Liquor Tax Act etc. and Food Labeling Act, where should we display the labeling names based on the Clause 6 of JAS for Organic Processed Foods, such as “有機 (Organic)” etc.?**

(A34-20)

As the mandatory items to be displayed on the labels for alcohol beverages are specified in Article 5-(5) of Act on Securing of Liquor Tax and on Liquor Business Associations (Act No.7 of 1953), requirements for the product name on the label under Food Labeling Act are deemed to be satisfied, by displaying the items for the alcohol beverages on the label. However, it's not permissible to label them as “有機 XX” or “XX (有機)”, because the items displayed on the label for the alcohol beverages are defined specifically under the Liquor Tax Act and Act on Securing of Liquor Tax and on Liquor Business Associations.

In such a case, regarding the organic etc. labeling requirements in accordance with JAS for Organic Processed Foods, apart from the display of items for the alcohol beverages, it is necessary to display the common name of the relevant alcohol beverages on the label, and label it in either of the following.

(1) “有機 XX” or “XX (有機)”, (2) “オーガニック XX” or “XX (オーガニック)”

※ “XX” should be expressed by using the common name of the relevant alcohol beverages.

**(Q34-21) Whereas the ingredients names are not required to be displayed on the labels in the case of selling alcohol beverages, according to Article 5 of Food Labeling Standards, how should we display the ingredients names based on the Clause 6 of JAS for organic processed foods?**

(A34-21)

Regarding the labeling requirements for Organic Processed Foods, it's necessary to comply with the labeling provisions specified in Clause 6 of JAS for Organic Processed Foods as regards the display of

product name and ingredients, as well as complying with Food Labeling Standards.

As you pointed out, as the display of ingredients on the label is not required in the case of selling alcohol beverages, according to Article 5 of Food Labeling Standards, the same applies to Organic Alcohol Beverages.

However, as regards the alcohol beverages, for which ingredients names are required to be displayed on the label in accordance with Labeling Standards for Alcohol Beverages specified in Article 86-(6) of Act on Securing of Liquor Tax and on Liquor Business Associations (Act No. 7 of 1953), (e.g. Labeling Standards for the Production Methods & Product Quality of *Sake* (NTA Notice No.8 of 1989), or Labeling Standards for the Production Methods & Product Quality of Fruit Wine (NTA Notice No.18 of 2015), it's necessary to display the names of the ingredients on the label separately based on the Clause 6 of JAS for Organic Processed Foods.

On the other hand, as regards those alcohol beverages, for which ingredients names are not required to be displayed on the label based in accordance with the Act on Securing of Liquor Tax and on Liquor Business Associations, etc., there should be no problem under JAS for Organic Processed Foods, even if the names of the ingredients are not displayed on the label.

**(Q34-22) Whereas our company is importing organic alcohol beverages labeled as organic from overseas, what about the labeling requirements for these organic alcohol beverages?**

(A34-22)

Imported organic alcohol beverages are subject to the following labeling requirements.

1) Transitional measure to be applied for 3 years from the enforcement date of amended Act on JAS (From Oct. 1, 2022, to Sept. 30, 2025)

During this period, importers of alcohol beverages are allowed to label their imported products in accordance with repealed standards, “the Labeling Standard for Organic Materials in Alcohol Beverage (NTA Notice No.7 of 2000)”.

According to the repealed standards, as regards the organic processed alcohol beverages of plant or livestock origin, in the cases where such alcohol beverages are imported from the countries or regions having the equivalent system to the grading system specified under Act on JAS, and that are certified under the organic certification system of the relevant countries or regions, being attached with the certificate (to prove it) issued by the government institutions etc. of the relevant countries or regions), it's possible to label those imported alcohol beverages as organic processed alcohol beverages of plant or livestock origin.

However, this transitional measure does not apply to those alcohol beverages attached with grade labels (such grade labels are attached to the products, or their packages or invoices) in accordance with amended Act on JAS.

2) Oct. 1, 2025 (Expiry date of transitional measures) and thereafter

As a general rule, in case of importing the relevant organic processed foods (that are certified under the organic certification system of the relevant countries or regions and labeled as “Organic”, etc.) from the countries or regions, with which Japan has recognized organic equivalency, importers must obtain organic JAS certification and affix organic JAS seals to the relevant organic processed foods as organic JAS certified importers.

In case of import from the countries or regions with which Japan has recognized organic equivalency, please refer to (Q5-1) ~ (Q5-14).

On the other hand, in case of importing the organic processed foods labeled as “Organic”, etc. from the countries or regions, with which Japan has not recognized organic equivalency, such manufacturers etc. (located in the relevant countries or regions) of the relevant organic processed foods must obtain organic JAS certification and affix organic JAS seals to the relevant organic processed foods accordingly.

**(Q34-23) With reference to 6.22 of 6.2 (Ingredients shown on the label) of JAS for Organic Processed Foods, in the cases where such “Marks or Signs” are displayed on the labels in place of the description of the ingredients such as “Organic” or “In conversion”, what kind of label display is permitted?**

(A34-23)

Regarding the organic ingredients used for the organic processed foods, whereas the word “Organic” etc. (“in-conversion” in the case of converting to organic) is to be included before or after the common product names used for the ingredient labeling, it's permissible to use signs such as “#” or “\*” in place of such words as “Organic” etc. or “In-conversion”. However, in this case, an explanation must be provided

outside the batch display frame on the label so that the consumers can understand that each symbol represents “Organic” etc.” or “In-conversion”. Some examples are shown below.

Product Name : 16 Grain Mixed Rice (In-conversion)  
 Ingredient Names : Barley#, Red Rice\*#, Glutinous Foxtail  
 millet\*#, Red Bean#, Black Bean#, Glutinous Barnyard  
 millet#, Amaranthus#, Red Rice\*#, Sprouted Brown  
 Rice#, Quinoa#, Sorghum bicolor#, Black sesame#,  
 White sesame\*#, Japanese millet\*#, Corn#, Pearl

“#” represents “Organic”

“\*” represents “In-conversion”

**(Q34-24) Regarding the provision specified in 6.1.2, which stipulates that “provided that the common name of the other organic processes foods be the same as the common name of the organic processed foods of plant origin, organic processed foods of livestock origin, and organic processed foods of plant/livestock origin, it’s necessary to clearly describe it”, what’s the reason for that? How should we describe it in order to comply with this provision?**

(A34-24)

1. Organic Processed Foods of Plant Origin, Organic Processed Foods of Livestock Origin and Organic Processed Foods of Plant and Livestock Origin are designated as the Designated Agricultural and Forestry Products, because it’s considered necessary to ensure the appropriate names especially for these products. So, as regards any agricultural products other than those designated agricultural and forestry products, it is prohibited to label them with the product names that are same as the names of such designated agricultural and forestry products.

For this reason, in the case of other organic processed foods (e.g. “*Kombu Senbei* (Seaweed Rice Cracker)”, “*Wakame Onigiri* (Seaweed Rice Ball)” etc.) whose common product name is the same as that of designated agricultural and forestry products, an explanation must be provided outside the batch display frame on the label so that the consumers can understand it.

2. You need to provide explanation such as “This product is Other Organic Processed Foods”, or “This product contains 6% organic *Wakame* seaweed”, for example.

## VII Others

**(Q35-1) Is it permissible to label the agrochemicals used for organic plants (such as fertilizers or pesticides) as JAS-compliant?**

(A35-1)

1. It is not desirable to label such fertilizers or pesticides as “Organic JAS-compliant fertilizer” or “JAS certified pesticide”, because it could be misinterpreted as being graded under JAS, whereas JAS for organic plant products specifies the production standards for plant products.

If you are to label such fertilizers or pesticides with the words that indicates usable for organic JAS, please use the words such as “Organic JAS Appended Table A.1-compliant materials or substances”, or “Pesticides Usable for organic JAS”, after confirming that the relevant fertilizers or pesticides comply with the standards specified in Appended Table etc. of organic JAS.

2. On the other hand, production of organic products of plant origin is based on the soil preparation in accordance with the provisions specified in Clause 4 “Production Principles for the Organic Products of Plant Origin” and 5.7 “Fertilizer Management in the Fields” of JAS for Organic Products of Plant Origin, prior to using the external input materials.

In the cases where the external input materials are used, it is necessary to confirm whether such use is due to unavoidable circumstances, or whether such materials comply with the standards specified in Appended Table etc.

**(Q35-2) In case we are to sell organic beef as organic seasoned beef in the supermarket, what kind of certification would be required?**



(A35-2)

You need to obtain Certification for Production Process Managers of Organic Processed Foods if you are to affix Organic JAS Seal to such processed product and sell it, because such multi-ingredient product (seasoned beef, assorted beef/pork meats, etc.) falls under the category of processed foods.

Besides, if you are to re-pack the organic beef etc., and affix the organic JAS seals to them at the packaging/stocking area or meat processing/preparation area of the supermarket, you need to obtain JAS Certification for Re-packers.

**(Q35-3) In the cases where farmers are to process their self-produced organic livestock products and sell them as organic processed foods, what kind of certification would be required?**

(A35-3)

You need to obtain Certification for Production Process Managers of Organic Processed Foods as well as Certification for Production Process Managers of Organic Livestock Products.

**(Q35-4) In the cases where we are to cut and slice edible meat in the supermarket, is it permissible to use those substances listed in Annex K-Table K.1 of JAS for Organic Livestock Products as disinfectant?**

(A35-4)

No, those substances listed in Annex K-Table K.1 are not allowed for use, as the use of such substances are limited to “for the purpose of disinfecting meat in the process of dismantling or cleaning eggs”.

Whereas it’s permissible to use such substances (detergent, disinfectant, etc.) for the purpose of cleaning or disinfecting the machinery or equipment that are used at the processing stage, it’s necessary to manage to prevent the ingredients or products from being contaminated with such detergent or disinfectant, by washing thoroughly in this case.

**(Q35-5) What is a unified list of substances or materials?**

(A35-5)

That is a list of substances and materials, which is considered compliant with organic JAS by the accredited certification bodies (accredited by Ministry of Agriculture, Forestry and Fisheries), and it is permissible for the operators to use such substances or materials specified in this list, without conducting a compliance check by themselves by obtaining the relevant documents (related to ingredients, production process, etc.) from the manufacturers of such substances or materials.

Such list of substances and materials is centrally managed and published on the MAFF’s (homepage) website.

Each certification body, who actually evaluated each item one by one, is responsible and accountable for the contents of this list of substances and materials.

On the other hand, accredited certification bodies are kindly requested to get creative to ease burden (on the producers) of checking the permitted substances and materials under organic JAS (e.g. Proactive disclosure of the substances and materials allowed for use under organic JAS)

**(Q35-6) Regarding the production process manager of the organic products of plant origin or organic feeds, who obtained a group certification for a group of farmers, does the relevant accredited certification body have to conduct an on-site inspection of all the fields and facilities possessed by all the members?**

(A35-6)

In order to encourage a wider adoption of organic JAS by group certification, except in the case of new certification inspection or inspection for adding additional fields, provided that the following requirements (as regards the management or control of fields etc. by the production process managers etc.) specified in 1 be satisfied, it would be permissible to conduct on-site inspection for the fields chosen by sampling in the manner specified in 2.

[Even in the cases where all the requirements specified in 1 were satisfied, you may choose to conduct an on-site inspection for all fields.]

1. Requirements for the management or control of production process/grading (of the certified group) by the Production Process Management Directors etc.

(1) Such production process/grading of the certified group must be managed/controlled in the following

way.

- ① A person who has completed the training course on the production process management or control of organic plant products or organic feeds at the workshop designated by the Production Process Management Director or accredited certification bodies, confirms on a regular basis whether the following activities are conducted at all the fields in accordance with the “Internal Rules” and “Grading Rules”, which are required for group certification, by referring to the documents/records etc. prepared by the staff who is directly controlling the relevant fields etc. and keep a record of these results. The Production Process Management Director is aware of the relevant results.
    - a) Measures taken to prevent the drift or runoff of prohibited substances into the fields
    - b) Separate storing and handling management of plant products, fertilizers, etc. at the storage facilities
    - c) Shipping management of the plant products harvested at the relevant fields, etc.
  - ② In order to confirm the above ①, someone other than those directly controlling the relevant fields to be checked visits the relevant fields and confirms whether it’s properly managed or not.
  - ③ If non-conformities were found in the above ①, such investigation (to determine cause) shall be carried out, immediate actions (exclusion of the relevant non-conforming operators from certification) and measures to prevent recurrence shall be taken properly, and such matter is recorded accordingly.
- (2) Implementation methods for management or control of production process and grading (specified in the above (1)) is specifically stipulated in the internal rules.

## 2. Implementation methods for the annual audit (conducted by the accredited certification bodies) for group Certification

- (1) At the annual audits, it is necessary to confirm whether the production process and grading (specified in the above 1-(1)) is managed properly in accordance the provisions specified in the internal rules of the relevant certified operators, in the following way.

(Confirmation Methods)

- It is necessary to confirm the relevant records (specified in the above 1-(1)-①～③) and conduct an interview with the production process management directors etc. and ask them about their implementation status (specified in the above 1-(1)-①～③).
- At the on-site inspection for the fields etc., it is necessary to confirm the implementation status (specified in the above 1-(1)-①～③).
  - Regarding the implementation status (specified in the above 1-(1)-①～③) according to the production process management directors etc., it is necessary to conduct an interview with the person who is directly managing the relevant fields etc. and ask them about it.
  - Regarding the confirmation of the above 1-(1)-①～③ by the production process management directors etc., check whether there’s no contradiction with the confirmation of the production process management status by the accredited certification bodies.

### (2) Selection of fields subject to on-site inspection

- ① Such number of fields to be selected for on-site inspection should be determined according to the risks involved※, but the minimum number should be no less than 10 or square root of the total number of the fields (rounded to the first decimal place), whichever is greater. Such on-site inspection shall be conducted for the selected fields as well as the related facilities (of the relevant fields).

※The following are considered to be risk factors:

The situation surrounding the relevant fields etc., Production items, Materials used, Production methods, situation of the past nonconformities, Changed items, for how many years the certification has been held by the person who directly controls the relevant fields etc., and so on.

- ② Accredited certification bodies shall create their inspection plan, ensuring that no field is left out of the on-site inspection by the accredited certification bodies for a long period of time.
- (3) It is necessary to specify the sampling inspection methods in their internal rules in accordance with Article 52-(3) of Regulation for Enforcement of the Act on JAS.
- (4) In case the management or control of the production process for the group as a whole was found inappropriate as a result of the annual inspection, it is necessary to take appropriate measures such as corrective action requests etc. in accordance with the internal rules of the accredited certification bodies, and it is also necessary to suspend sampling inspection immediately and switch to the complete inspection.

**(Q35-7) Regarding the on-site inspection conducted by an accredited certification body for the certified operators (such as product process managers, re-packers, importers) who handle organic products (such as organic plant products, organic livestock products or organic feeds), is it permissible to conduct it remotely regardless of the impact of COVID-19?**

(A35-7)

In the cases where the remote access environment is in place on both sides of accredited certification bodies and operators, and provided that it's possible to ensure the same level of inspection as the on-site inspection (conducted by physically visiting the location), it is permissible to conduct such on-site inspection (carried out by accredited certification bodies) remotely for certified operators (production process managers, re-packers, importers) of organic plant products, organic livestock products, organic processed foods and organic feeds, in accordance with the Procedures for Remote Inspection specified in the following 1, in consideration of the points of concern specified in the following 2.

However, even in the case of conducting on-site inspection remotely, it's necessary to conduct a site-visit at least once every 4 years, as an extra precaution for the operation.

Besides, it's necessary to conduct a site-visit in the following cases.

① Inspection for a new certificate (or inspection for the addition of fields or facilities)

② In the cases where it is determined that site-visit is necessary based on the findings from the inspection of documents, even in the case of the inspection (for renewal) conducted from the second year and onwards.

Even in the cases where on-site visit is necessary, it would be permissible to conduct additional hearings or collect documents through remote work tools.

On the other hand, even if the above ①② does not apply, certified operators may still choose on-site inspection by on-site visit.

**1. Procedures for Remote Inspection**

- (1) The relevant records and documents are to be sent to the accredited certification bodies electronically in advance, and the accredited certification bodies must confirm them accordingly.
- (2) Regarding the status of fields, factories, etc. (such as threshold of non-organic field soils, measures taken to prevent the drift or runoff of prohibited substances, separate operation management status at the production line or storage facilities), accredited certification bodies must check them in real time by the online video recorder and save the video recordings as their inspection evidence.
- (3) If there's anything unclear in the above information specified in (1) and (2), accredited certification bodies must check them online or by phone additionally.

**2. Points of Concern in case the accredited certification bodies conduct Remote Inspection**

- (1) Remote inspections must be conducted by using smartphones, mobile devices, Personal computers, etc., and sharing audio, image, and data. As regards the relevant records, for example, their copies may be confirmed by e-mails etc. Status of fields or factories may be confirmed by online video.  
However, it is desirable to do this in real time whenever possible.
- (2) The necessary steps must be taken to ensure that the security and confidentiality should be maintained all through the inspection.
- (3) Such procedures for remote inspection must be specified in the internal rules in accordance with Article 52-(3) of Regulation for Enforcement of the Act on JAS.
- (4) Records should be kept in such a way that anyone can understand which inspection items have been conducted remotely.

**(Q35-8) Regarding the organic plant products or organic feeds, that are fumigated as required by the Plant Protection Act,**

**1) Is it possible for the certified importers to import such products under the equivalency arrangement and affix the grade labels to them?**

**2) Is it possible for the certified production process managers of organic feeds or the certified production process managers of organic livestock products to use such fumigated organic feeds (as being graded under the equivalency countries' organic system) as the ingredients for the organic feeds or feeds for the organic livestock products?**

**3) Is it possible for the uncertified importers to import such foreign-grade labeled organic plant products and sell them as it is (being labeled with foreign-grade) etc.?**

(A35-8)

(1) Provided that the following requirements be satisfied, it would be possible for the certified importers

to import such fumigated organic plant products in accordance with the Technical Certification Criteria for Production Process Managers of Organic Products of Plant Origin and affix grade labels to the relevant organic plant products.

a) Properly managed system (see the Note below) for the fumigation treatment is established by the certified importers in accordance with 5.2-a) (Receiving of the Organic Plant Products), 5.3 (Appropriate receiving of imported products in accordance with the internal rules), 7.2.1 – c) (Handling of the lots found nonconformity with JAS for organic plant products etc. after shipment), and 7.2.2 (Appropriate labeling in accordance with the grade labeling rules) of the technical certification criteria for importers.

b) Such agricultural chemicals used in the fumigation treatment are listed in Annex B-Table B.1 of JAS for Organic Products of Plant Origin, and it is confirmed that there's no possibility of contamination with prohibited substances in the relevant treatment. (※※)

However, it's not permissible to affix grade label to any plant products contaminated with the prohibited substances after fumigation (including those plant products fumigated by the substances other than those listed in Table B.1 of JAS for Organic Products of Plant Origin, such as methyl bromide)

(Note): In order to manage it properly in accordance with the technical certification criteria for importers, it may be stipulated in the provision (for Receiving) of the internal rules that such plant products fumigated by the substances listed in Table B.1 of JAS for Organic Products of Plant Origin would be accepted if it is confirmed by the warehouse operator's fumigation records that the most recent fumigation has been managed in accordance with the Hazard Prevention Measures Outline for the Plant Quarantine Fumigation\*, or it may be stipulated in the provision (for the lots found to be non-conformation with JAS for organic plant products etc. after shipment) of the internal rules that "In the cases where the information on the contamination with prohibited substances were provided from the warehouse operators, it is necessary to pass it on to the final destination of the shipment."

(2) Provided that the following requirements be satisfied, it would be possible for the production process managers of organic feeds or the certified production process managers of organic livestock products to use such fumigated organic feeds (as being graded under the equivalency countries' organic system) as the ingredients for the organic feeds or feeds for the organic livestock products.

a) Properly managed system (see the Note below) for the fumigation treatment is established (same as the above (1)-a))

b) Such agricultural chemicals used in the fumigation treatment are listed in Annex B-Table B.1 of JAS for Organic Products of Plant Origin, and it is confirmed that there is no possibility of contamination with prohibited substances in the relevant treatment. (※※)

However, it is not permissible to use such plant products\*\* contaminated with the prohibited substances after fumigation, as the ingredients for the organic feeds, or feeds for the organic livestock products.

\*\*(including those plant products fumigated by the substances other than those listed in Table B.1 of JAS for Organic Products of Plant Origin, such as methyl bromide)

(3) In the cases where such agricultural chemicals used in the fumigation treatment are listed in Annex B-Table B.1 of JAS for Organic Products of Plant Origin, and it is confirmed that there's no possibility of contamination with prohibited substances in the relevant treatment (※※), it's not necessary for the uncertified importers, who import organic plant products (attached with the grade labels), to remove or delete such grade labels.

However, it's necessary to remove or delete such grade labels affixed to the plant products contaminated with the prohibited substances after fumigation (including those plant products fumigated by the substances other than those listed in Table B.1 of JAS for Organic Products of Plant Origin, such as methyl bromide), in accordance with Article 41-(1) of Act on JAS.

※ It would be possible to determine that there is no possibility of contamination with prohibited substances in the relevant fumigation treatment, if you can confirm by the relevant fumigation records that fumigant concentration level measured after the most recent fumigation (using prohibited substances) was below the minimum inhibitory concentration specified in the "Hazard Prevention Measures Outline for the Plant Quarantine Fumigation," whereas fumigation may be carried out at the fumigation facilities using prohibited substances such as methyl bromide.

\* “Hazard Prevention Measures Outline for the Plant Quarantine Fumigation”  
[https://www.maff.go.jp/pps/j/law/houki/yoko/yoko\\_67\\_html\\_67.html](https://www.maff.go.jp/pps/j/law/houki/yoko/yoko_67_html_67.html)