

JAS Certification Information Pack



JAS CERTIFICATION WITH NCO

NASAA CERTIFIED ORGANIC Pty Ltd (NCO) is accredited by the Japanese Government's Ministry of Agriculture, Fisheries & Food (MAFF) to offer JAS certification to operators who are compliant with the Japanese Agricultural Standard (JAS) Organic Law.

1. REQUIREMENTS & SCOPE OF JAS ORGANIC LAW

The scope of the JAS Organic Standards is set out below:

TYPE	JAS
Plant & Plant Products	Obligatory
Livestock Products	Optional
Livestock Feed	Optional
Honey, Alcohol, Cosmetics, Pharmaceuticals	Excluded

This means that an organic plant product MUST carry a JAS label, organic livestock products and feed MAY carry a JAS label and organic honey, alcohol, cosmetic and pharmaceutical products MUST NOT carry a JAS label—when sold in Japan.

2. EQUIVALENCE BETWEEN JAS and AQIS and its EXTENT

2.1 OPERATORS WITHIN AUSTRALIA

Plant and plant products produced in Australia and sold to Japanese JAS certified processors are covered by the Japan/ Australia equivalence.

Under this agreement the Ministry of Agriculture, Fisheries & Food (MAFF) in Japan recognises the standards of the Australian National Standard, administered under AQIS, as equivalent to the requirements of the JAS Law for plant and plant products only with the exception of five products which are:

- wetting agents;
- white oil;
- disodium diphosphate;
- ammonium phosphate; and
- ammonium sulphate.

Raw and/or bulk processed plant product does not itself need to be JAS certified if imported by a JAS certified operator in Japan for onward processing. However, equivalence does not confer the right to use a JAS Label which is solely reserved for operators who are certified under JAS.

Within Australia the only operators who must be JAS certified are those who intend to directly apply the JAS Label—ie to product to be sold directly to the Japanese consumer rather than for on-processing.

Exporters from Australia of raw and/or bulk plant product from Australia to Japan who are not intending to apply the JAS label must obtain an Export Declaration from their certifier to verify that the specified product has been produced in accordance with the Australian National Standard. This declaration must accompany the goods along with an additional statutory declaration to verify that the five prohibited products itemised in the equivalence agreement have not been used during any stage in the production and/or processing of product.

The equivalence agreement is limited to plant and plant products and does not apply to livestock products and feed wherever they are produced.

2.2 OPERATORS OUTSIDE AUSTRALIA

The equivalence agreement does not apply outside Australia.

Operations outside Australia intending to export organic product to Japan – raw, bulk and processed - have not been granted JAS equivalence through Australian Quarantine Inspection Service (AQIS) and are therefore required to ensure that the entire supply chain is certified under JAS.

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Type of product	Category	Produced in	Requirement under JAS	Notes or Conditions
Raw plant and plant products and processed plant product in bulk	FARM	Australia	Compliance with JAS/ Australia equivalence requirements only	Can only be sold to a JAS processor for onward processing
Raw plant and plant products and processed plant product in bulk	FARM	Overseas	Must be JAS certified but equivalence does not apply	
Processed plant & plant products to be JAS labelled	PROCESSING	Australia and overseas	Must be JAS certified	
Repackaged JAS-labelled product	RE-PACKING	Australia and overseas	Must be JAS certified	
Livestock Feed for JAS livestock products	FEED	Australia and overseas	May be JAS certified but equivalence does not apply	Needed for JAS livestock products to be labelled JAS
Livestock Products	LIVESTOCK PRODUCTS	Australia and overseas	May be JAS certified but equivalence does not apply	

This table sets out the scope of the equivalence and its limits.

CATEGORY	STANDARD	TECHNICAL CRITERIA
PLANT & PLANT PRODUCTS	JAS STANDARD for Organic Plants (1605)	TECHNICAL CRITERIA for Production Process Managers of Organic Plants and Organic Feeds (1830)
PROCESSING	JAS STANDARD for Organic Processed Foods(1606)	TECHNICAL CRITERIA for Production Process Managers of Organic Processed Foods and Organic Feeds (1831)
LIVESTOCK FEED	JAS STANDARD for Organic Feed (1607)	TECHNICAL CRITERIA for Production Process Managers of Organic Plants and Organic Feeds (1830) and TECHNICAL CRITERIA for Production Process Managers of Organic Processed Foods and Organic Feeds (1831)
UNPROCESSED LIVESTOCK PRODUCTS (Any brought-in feeds for these animals must also be JAS certified)	JAS STANDARD for Organic Livestock Products (1608)	TECHNICAL CRITERIA for Production Process Managers of Organic Livestock Products (1832)
PROCESSED MEAT PRODUCTS	JAS STANDARD for Organic Processed Foods(1606)	TECHNICAL CRITERIA for Production Process Managers of Organic Processed Foods and Organic Feeds (1831)
RE-PACKING (Re-Packing only applies to already JAS-labelled product. Otherwise the Processor category applies).	One or all of the above JAS Standards (1605, 1606, 1607, 1608) depending upon the products being re-packed.	TECHNICAL CRITERIA for Repacking Manager of Organic Plants, Processed Foods, Feed and Livestock Products of Organic Plants and Organic Feeds (1833)

3. RELEVANT DOCUMENTS FOR EACH CATEGORY

The relevant JAS Standard and associated TECHNICAL CRITERIA for each category are set out below:

4. NCO JAS APPLICATION PACK

This comprises an Application Form and this JAS Certification Information Pack. Once a completed application form has been returned to NCO you will be sent: the relevant JAS Standard (except for re-packers), the relevant Technical Criteria, the PPM Inspection Methods document (except for re-packers) and an NCO JAS Organic Management template form for you to complete.

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5. REQUIREMENTS IN THE TECHNICAL CRITERIA

The JAS Technical Criteria define the requirements for systems documentation, personnel qualifications, company organisation and infrastructure, grading and labelling for each type of JAS entity. These are required by JAS to demonstrate control of production and packaging processes and to verify compliance with the JAS Standards.

5.1 QUALIFICATIONS OF PERSONNEL

Under JAS certification there is a requirement for designation of personnel and positions that are not generally part of other certifications. When applying for JAS certification you will need to identify an individual who will be responsible for the Production Process Management Operations (the Production Process Manager) and an individual who will be responsible for Grading (the Grading Manager). Such individuals will need to have either completed a university degree or have a minimum of 3 years relevant working experience.

5.2 ESSENTIAL JAS ROLES

Under JAS Farmers, Processors and Producers of Livestock Products and of Livestock Feed operators need to have a **Production Process Manager** and a **Grading Manager**.

Re-packers of JAS labelled product must have a **Re-Packing Manager (RPM)** and a **Labelling Manager (LM)**.

- **Production Process Manager (PPM)**

The PPM is a Farm or Facility Manager who sets up an organic production and/or handling plan.

The PPM must then manage the production process within a quality management system so that there are production process management records for each production lot which the PPM then checks to ensure that they comply with the JAS Standard.

A JAS Quality Manual is essential for the management of the production process and the internal standard operating procedures must be reviewed regularly and changes to them must be notified to those involved so that they are effectively implemented.

The PPM must keep records of management or control for at least one year after shipment of graded JAS product.

- **Grading Manager (GM)**

The GM is a completely separate function from the PPM and from the sales and marketing division of your operation.

Grading is essentially an internal auditing and verification process that is implemented prior to the application of the JAS logo. Despite the use of the term "grading", JAS Grading is not inspection for quality.

The GM checks the PPM's records (field history, field maps, organic operation, off-farm input log, etc.) to verify that a product meets the JAS standards before the JAS label is put on the products.

NOTE

If the licensee has a third party undertaking organic activity the PPM and the GM must be appointees of the licensee, not of the third party (the staff may belong

If the licensee has a third party undertaking organic activity they must be clearly referenced in the application form and the Organic Management Plan.

If the licensee has a subsidiary undertaking organic activity in the same country as the licensee PPM and GM should be appointees of the subsidiary rather than the head office.

- **Re-Packing Manager**

The RPM establishes a re-packing plan which sets internal rules for acceptability of produce, re-packing methods, use of machinery and systems to enable overview by NCO.

- **Grading Labelling Manager**

The GLM, who must be separate from the sales section of the company, establishes systems to check and monitor application of the JAS label (grading as such does not occur as the products have already been graded elsewhere and given a JAS Label as an outcome).

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6. JAS OPERATOR TRAINING

JAS requires that all JAS applicants are trained in the requirements of JAS before being certified.

NCO will make arrangements to train your designated personnel and this will usually be given by the NCO inspector at the time of the first inspection.

The JAS Law requires that this is a 5 hour session and that at a minimum the operator's key personnel—the Production Process Manager and the Grading Manager (or Re-Packing Manager and Labelling Manager for re-packers) are trained at that time.

The fees are set out in NCO's Fee Schedule.

7. CHECKLIST: ARE YOU READY FOR JAS?

1. Have you read the relevant JAS Standard and the relevant Technical Criteria for your operation?
2. Do you have personnel who can meet the educational requirements set out in the relevant Technical Criteria?
3. Have you developed a Quality Control Manual and does it specifically address JAS requirements?
4. Are systems in place to enable internal auditing?
5. Are internal audits carried out routinely?
6. Is there a procedure for Product Recall?
7. Are records maintained for use of label (including wastage)?
8. Have you got systems in place to organise grading for each batch lot?
9. Are there SOPs for all work operations involved with organic product?

8. PROCESS OF BECOMING JAS CERTIFIED BY NCO

All applications made to NCO for JAS certification which will be dealt with in a fair and objective manner.

Once we receive your application and Organic Management Plan this will be checked against the relevant JAS requirements. If changes are required you will be notified of these. If NCO is unable to accept your application we will inform you of the reasons for this.

Once your OMP has been fully finalized, NCO will allocate an inspector to visit your operation and we will write to you to tell you the name of the inspector and the estimated costs of the inspection. In the interests of efficiency for the operator NCO may on occasion subcontract the inspection task to another body, however any certification decision arising from the report will be made solely by NCO.

Once NCO receives the inspector's report it will send you a copy and request any input from you about the content of the report. Once the report is finalized NCO will make a certification decision and communicate that to you in writing.

If NCO decides that your operation is compliant with JAS, NCO will send you a Contract. If NCO determines that you need to correct non-compliances with JAS these will be supplied to you for action. If NCO needs to reinspect your operation to check the implementation of these changes you will be notified of this requirement in writing.

9. NCO JAS FEES

NCO JAS fees are set out in the NCO JAS Fee Schedule. They comprises an initial application fee, initial review fee, inspection cost and Annual Fee.

Applicants for JAS are required to complete an Application Form and an Organic Management or Handling Plan and to supply various other documents to NCO such as a map or facility plan.

Once the application has been accepted by NCO and any further required information has been supplied, NCO will write to inform you that it intends to arrange a site inspection and to indicate the likely costs of that visit.

For more information contact NCO P/L

T: +61 8 8370 8455 F: +61 8 8370 8381 E: enquiries@nasaa.com.au W: www.nasaa.com.au;

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10. OBLIGATIONS and DUTIES OF NCO and the OPERATOR

As with any certification system there are rights and duties between both parties. If NCO is able to certify your operation for JAS these will be set out in the Operator Contract. However, it is important for that you are also informed of these arrangements at the start so they are set out here below for your information. Please contact NCO if you have any questions about them.

1. PROVISION OF INFORMATION BY NCO

- NCO will provide applicants for certification with documents which describe the certification procedure, the JAS Law (including government ordinances, ministerial ordinances, notices and notifications), the Japan Agricultural Standard for agricultural and forestry products for the said certification scope, technical standards for certification, requirements by NCO, necessary costs, the method for payment of these costs, and rights and obligations of the applicants;
- NCO will respond to a request from an applicant to provide additional information and advice concerning the certification within the bounds of providing general information as NCO may not offer consultancy services as well as certification;

2. OPERATORS MUST:

- Comply with the relevant JAS Standards and Technical Criteria;
- Observe the stipulations of the JAS Law concerning labelling for grading;
- Comply with any order for improvement of labelling for grading made by the MAFF Minister, comply with any request for reporting by FAMIC, not provide false reports and not reject, obstruct and avoid on-site inspection;
- Notify NCO in advance of any intended change(s) to the certification;
- Notify NCO if they wish to withdraw from certification;
- Not advertise or label their certification status in a misleading way (ie that agricultural products which are not certified by NCO are certified or misleading information concerning details of NCO's inspection for certification and other operations concerning certification);
- Respond to NCO and make appropriate changes to labelling if NCO identifies mis-leading labelling and calls for improvement or discontinuation of advertisement and methods for labelling;
- Not make mis-leading claims in promotional literature or material (ie that agricultural products which are not certified by NCO are certified);
- Co-operate with investigations etc undertaken by NCO;
- Report actual grading results of the preceding financial year to NCO by the end of June each year;
- Submit to NCO necessary reports or allow NCO free access to inspect grading advertisement or labelling of agricultural and forestry products, agricultural and forestry products, raw materials, factories, ledgers and other items by visiting offices, farms, etc;
- Return to NCO the Certificate of Registration if the PPM withdraws from certification or if NCO suspends the PPM's certification or terminates it;

3. NCO WILL:

- Suspend the certification or request that the PPM discontinues grading operations and ceases the shipment of products with labelling of grading if the PPM breaches the conditions stipulated in (2) above, or does not report to NCO or provide false reports or rejects, obstructs or avoids inspection by NCO;
- Terminate the certification if the PPM does not respond adequately to NCO requests for information;
- Publish names and addresses of certified production process managers, kinds of agricultural and forestry products subject to the certification, names and addresses of farms, etc., subject to the certification, and the date/month/year when the certification was granted.
- Publish the date/month/year and reasons for the request or withdrawal when an operator cancels their certification.
- Publish the date/month/year of the termination when NCO cancels a certification;
- Investigate any complaint made about JAS-certified products certified by NCO and keep a record of such complaints.

Annex: Guidance Notes on JAS Roles

1. TASKS OF JAS PRODUCTION PROCESS MANAGER (for all but re-packers)

The PPM is a Farm or Facility Manager. They set up a JAS organic management plan for the operation, create a quality management system to manage and administer the plan, assess the system against the relevant JAS Standard and maintain records of this entire process.

The Technical Criteria set down the requirements of the organic plan.

The MAFF document "Inspection Methods for Production Processes of Organic Plants, Organic Processed Foods, Organic Feeds and Organic Livestock Products" (1971) sets down what the PPM must do to check the production system against JAS requirements.

An operator's existing quality management system can be amended to include JAS or the operator can create a separate JAS quality system.

1.1 ORGANIC PLAN & QUALITY SYSTEM

All operators need a plan to address the relevant JAS Standards & Technical Criteria. In addition the JAS operator will need standard operating procedures for the following matters and these will need to be implemented and documented as such irrespective of an operator's other certifications.

Crops

- **Seeds and planting materials** eg Are all seeds are sourced from on farm and records from harvest are maintained for this.
- **Fertility and pest control** this requires written procedures for how fertility and pest control problems are identified and managed.
- **Machinery used** as per processing requirements
- **Post harvest and handling** this would reference on-farm storage of product (including drying)
- **Post farm gate transport** this would involve procedures which outline how products are transported to processing plants

Processing

- **Receival and storage of raw material** (e.g. goods to be received must be identified as organic, with certification number and name of where the goods came from, quantity, certificates must be maintained at point of receival to verify organic status of product, and storage of certified product must be identified and segregated from non organic product). You will need to maintain records to ensure that the procedure can be verified by a NCO inspector, and also to enable verification from your internal auditor.
- **Product recipe** You must have records or ingredients for all products. e.g for roasted cashews this would need to specify cashews and oil (type) and percentages and certification details for all ingredients. Records will need to be maintained to verify these procedures to ensure that both the NCO inspector, and your internal auditor, can carry out regular inspections/audits.
- **Manufacturing and processing methods** This should be outlined on your Process Flow Chart which must indicate organic control points. You should have SOPs to correspond with the Process Flow Chart and in particular organic control points. e.g. prior to the start of any organic process run, a thorough clean down must be implemented followed by a flush of warm water to remove any residues. Records will need to be able to verify these procedures to ensure that both the NCO inspector, and your internal auditor, can carry out regular inspections/audits.
- **Machines and tools used for processing** JAS requires that an inventory for all machinery is maintained with reference to how the machinery is used in the processing of organic product.
- **Transportation (post processing)** You must have procedures which detail how the finished product is transported, including shipping details. These procedures will also need to have corresponding records to enable both internal and external auditing of the procedures.

Raw Livestock Products

- **On-farm management:** This category covers all issues of animal management from housing to stocking densities to sourcing of feed and surgical procedures. These must all be documented.
- **Post-farm management:** Transportation and slaughter must be in compliance with the JAS Standards.

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Livestock Feed

As per Crops above if feed is not processed. If it is processed both Crops and Processing categories above apply.

Re-Packing

- **Receival of JAS labelled goods:** If a re-packer handles product under other certifications they will need a separate system to keep JAS incoming and outgoing product separated together with records to demonstrate such.
- **Checking of grading labels:** A system will need to be in place to check that product is JAS labelled or JAS certified prior to re-packing process

1.2 RECORDS FOR EACH LOT

Once the PPM has an organic plan and a quality system to support it, they then need to maintain records for **each lot** which may potentially bear the JAS Label as follows:

ORGANIC PLANTS and UNPROCESSED ORGANIC FEEDS

- Location of fields, collection areas and any facilities which are used for the lot eg storing place, cleaning vegetable facility, etc. (precise location and address must be specified);
- Types of crops produced;
- Growing area;
- Date and description of work practices;
- Name and amount of used seeds, seedlings, nursery stocks, scions etc;
- Name and amount of used substances for plant pest and disease control;
- Types of machines and tools used and how they have been used;
- Management methods of harvest, transportation, selection, cleaning, storage, packaging, processing and any other post-harvest processes.

ORGANIC PROCESSED FOODS and ORGANIC PROCESSED FEEDS

- Location of production facilities any facilities which are used for the lot eg storing place, cleaning vegetable facility, etc. (precise location and address must be specified)
- Types of processed foods or feeds produced, date of manufacture, description of manufacture, ingredients and their percentages;
- Name and amount of used food additives, feed additives, chemicals etc;
- Types of machines and tools used and how they have been used;
- Management methods of production, processing, storage, packaging and other processes.

ORGANIC LIVESTOCK PRODUCTS (raw meat)

- Location of fields or collection areas any facilities which are used for the lot eg storing place, cleaning vegetable facility, etc. (precise location and address must be specified)
- Name and amount of used substances for plant pest and disease control;
- Types of machines and tools used and how they have been used;
- Origin of livestock used for production;
- Breeding record of each animal or group of animals (date of starting organic livestock production, content and amount of feed, access to open air/ free range, surgical procedures used if any, type and date of used animal drugs;
- Arrangements for brought-in feed if used (brought-in feed must be JAS certified)
- Management method of livestock excrements;
- Transportation method of livestock
- Method of milking or collecting eggs;
- Management methods of transportation, selection, slaughter, cleaning, storage, packaging, processing and any other post-production processes.

ORGANIC LIVESTOCK PRODUCTS (processed meat products)

Refer to Organic Livestock Products and Organic Processed Foods above

Annex: Guidance Notes on JAS Roles

1.3 CHECK AGAINST THE JAS STANDARDS

The PPM must then create a system to assess whether the produce created in the specific lot complies with Article 4 of the relevant JAS Standard.

NOTE: Ingredients produced and/or processed under a certifier accredited by AQIS are allowable as JAS-compliant ingredients provided they have not been produced using wetting agents, white oil, disodium diphosphate, ammonium phosphate and ammonium sulphate.

1.4 RECORD-KEEPING

Throughout, the PPM must also create and maintain records of the production process, inventory control of incoming materials, invoices and shipping documents for a minimum of one year from the date of delivery of the product.

2. TASKS OF GRADING MANAGER (for all but re-packers)

The GM function is totally separate from the PPM and also from the marketing function in the operation.

The GM's tasks are two-fold:

1. GRADING ASSESSMENT OF PPM's PRODUCT AGAINST JAS

The GM's principal task is to cross-check the information contained in the PPM's records to ensure that only goods which are truly JAS compliant are graded for JAS labelling.

For example in the case of organic plant products or unprocessed feed the GM must check:

- Whether or not the product has been harvested from the "certified" field (system must be able to demonstrate traceability);
- Whether or not the product is specified under certification;
- Whether or not the land used to produce the product is certified;
- Whether or not production process records are kept for the field and for the specific crop;
- Checking which seeds/seedlings have been utilized and their proof of purchase, and whether the quantity of seeds/seedlings are suitable for the acreage of that field;
- Checking all agricultural materials, (fertilizers, insecticides, etc) meet the standard, that no prohibited materials have been used and that production process records are properly in place;
- Checking what machinery or tools have been used in production, whether they have been properly washed or cleaned before use and checking that washing records are kept;
- Checking that the processes for harvesting, transportation, selection, cleaning, storage and packaging are conducted in such a way that there is no contamination of the certified product with uncertified product or prohibited substances

The GM should create a Grading Checklist for each lot to record this grading assessment.

If the GM is satisfied that the information collected by the PPM is comprehensive AND that it satisfies the JAS Standard, the GM can go ahead and "grade" the product for JAS labelling.

2. MANAGING THE LABELLING OF THE PRODUCT

Once the GM has graded the product for JAS labelling they must then:

- Ensure that the JAS Label is properly used on the product and that NCO, as the certifier, views the labelling artwork and agrees it before it is printed;
- Have a system of procedures in place to manage goods which have been found not acceptable under JAS;
- Create and maintain records of grading, production process, inventory control of incoming materials, invoices and shipping documents for a minimum of one year from the date of delivery of the product;
- Make a composite annual report for the period January—December to NCO, as the certifier, by June 30 each year;
- Have an internal auditing system in place to ensure that the GM's grading regulations are properly carried out and the JAS Labels are correctly used on product in accordance with Article 5 of the JAS Standard.

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3. TASKS OF RE-PACKING MANAGER (for re-packers only)

The RPM sets up an organic re-packing plan which includes:

- System for receipt and storage of JAS organic crops, organic processed foods, organic feeds and organic livestock products;
- System to check and confirm that the goods are JAS certified before re-packing;
- Method(s) used to re-pack the goods;
- Types of machines and tools used and how they have been used;

The Re-Packing Manager must be totally separate from the GLM and also from the marketing function in the operation.

The RPM oversees the re-packing of JAS certified product so there is no need to assess the production of the product against the JAS Standard but simply the re-packing process.

The RPM creates internal records regarding the re-packing of organic products.

4. TASKS OF GRADING LABELLING MANAGER (for re-packers only)

The goods to be re-packed have already been graded elsewhere for JAS and received a JAS Label. The GLM's tasks are therefore simply to manage the labelling of the product as follows:

- Ensure that the JAS Label is properly used on the product and that NCO, as the certifier, views the labelling artwork and agrees it before it is printed;
- Have a system of procedures in place to manage goods which have been found not acceptable under JAS;
- Create and maintain records of grading for five years after the grading event;
- Make a composite annual report for the period January—December to NCO, as the certifier, by June 30 each year;
- Have an internal auditing system in place to ensure that the GLM's grading regulations are properly carried out and the JAS Labels are correctly used on product in accordance with Article 5 of the JAS Standard.