



## JAS Certification Overview for Processors

JAS certification offered through QAI is a separate, stand-alone certification. However, participants in the program must also be certified by a certifier who is either NOP, ISO 65 or IFOAM accredited. This document covers the minimum requirements that you will need to meet in order to be eligible for JAS certification. These requirements are in addition to what is generally required under your normal organic certification.

See also the following supporting documents for further information:

1. Japanese Agricultural Standard (JAS) for Organic Agricultural Processed Foods (including food additives and chemical substances lists)
2. Technical Criteria of Organic Certification for Manufacturers
3. QAI JAS Program Summary and Grading Manual

### Requirements for JAS Processors<sup>1</sup>

1. **Grading** – Grading is the formal and documented assessment of any product as JAS compliant.
2. **Grading Department<sup>2</sup>** – The Grading Department acts much like resident organic inspectors whose responsibilities include checking that all organic procedures for receiving, storing, processing, shipping, labeling, and grading are being followed for every batch of organic product. The Grading Department performs an internal audit of the company's quality system, keeps a record of the audit and, for each batch, ultimately decides whether or not the JAS seal should be applied to the products in question. The Grading Department must be separate from both production and sales departments since the Grading Department must have the authority to reject product if the verification required cannot be demonstrated. An organizational flow chart, which illustrates the separation of the grading department from sales and production, is required upon application for JAS certification. See also, the QAI JAS Program Summary for further details and for examples of grading records.
3. **Education and Experience** – JAS requires that persons fulfilling the roles of the Grading Manager and the Quality Control Manager must be educated/experienced up to a certain level. That is, they must meet with any of the three following requirements:
  - a) University or professional school degree relating to food processing or similar experience with 1 year of food processing or testing experience.
  - b) High school or secondary school degree or similar experience with 2 years of food processing or testing experience.
  - c) 3 years of food processing or testing experience.
4. **Standard Operating Procedures (SOP's)<sup>3</sup>** – SOP's need to be maintained for all stages of production, including receiving and storing of raw materials, formulations of finished

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<sup>1</sup> In JAS language, "Processors" are known as "Manufacturers". In order to be classed as a manufacturer, you must sufficiently "change" the raw materials in some way (eg, blending, milling, formulating). The re-packing, cleaning, freezing or distributing of a product does not constitute manufacturing. See *JAS Overview for Re-packers, Traders and Distributors*.

<sup>2</sup> All grading staff must attend a training seminar provided by QAI or the QAI inspector during inspection.

<sup>3</sup> While there is no set format, the SOP's will need to describe how each JAS organic product is manufactured. In addition, a record will need to be kept that the procedure happened and when, and someone will need to go through the records checking that processing followed the set procedure and record this check. A "Complaints Log" is also required under JAS certification.

products, processing methods and machinery and/or tools used in production, and shipping of finished products.

5. **Standard Operating Procedures for Grading** -- SOP's will also need to be maintained for the act of grading. Such SOP's would include matters related to the internal inspection of the manufacturing process, matters related to the verification that compliant ingredients and additives were used during organic processing, matters related to the labeling of the grading, matters related to the shipping or disposal of the consignment after grading<sup>4</sup>, matters related to the drafting and custody of the record, matters necessary for enabling inspection and verification by the certifier. Refer also to the QAI JAS Program Summary, page 4 – 9 for further information and examples of grading SOP's.
6. **Records that verify SOP's were followed** – Documents that verify that the SOP's have been followed will need to be maintained and made available to the internal auditor as well as the QAI inspector. Grading records that confirm that the products are eligible to be labeled with the JAS seal will need to be kept for each batch produced and shipped. See samples of the Producer JAS Grading record in the QAI JAS Program Summary (pg 8).
7. **Food Additives and Pest Control Products** – Refer to Attached Table 1 and 2 of the JAS Organic Standards for Processed Products for a list of food additives that can be used in JAS certified processed products and chemical agents that can be used for pest control in facilities. Non-organic ingredients used in organic production must be approved according to the JAS Standard. They must be properly stored in a manner clearly distinctive from organic materials. Chemicals used for pest control must be approved according to the JAS Organic Standard. However, if it can be verified that the organic products, ingredients or packaging materials are at no risk of being contaminated by chemical substances, chemicals not included in the JAS Standard can be used. Any questions regarding pest control inputs should be directed to QAI for clarification.
8. **Labeling and Seal Use** -- JAS Organic labeling is very specific and will need to be compliant with the JAS Law. Refer to Article 5 of the Japanese Agricultural Standard. All products have to be approved by the grading department or grading manager before the JAS seal can be applied. For bulk goods, the JAS seal will need to appear on every bulk bag, or on shipping documentation if product is not in individual containers/bags. The use of the words "JAS Certified" in the absence of a documented grading verification and placement of the JAS seal is not compliant with the JAS Law. Seal format must meet size and format requirements listed in the JAS Standard when placed on shipping and/or other accompanying documentation. The name of the manufacturer must be stated on all packaged products.
9. **Ingredients and Suppliers** – Ingredients or raw materials for processed foods must be 95% Organic JAS by weight (excluding water and salt). There is no distinction for "100% Organic" or "Made With Organic..." Suppliers of organic ingredients must meet either of the following criteria:
  - a) Have their own JAS certification. A copy of the supplier's current JAS certificate must be kept on file by the processor. All batches of JAS certified ingredients must arrive labeled with the JAS Seal or include the JAS Seal on shipping documentation when bulk ingredients are supplied.
  - b) Be approved under the USDA/MAFF Export Arrangement. A current NOP Certificate must be kept on file by the processor. In addition, documentation from the vendor's certifier that the ingredient meets the requirements of the USDA/MAFF export arrangement must be on file with the processor at the time the ingredient is used. This will need to be verified during grading.

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<sup>4</sup> A procedure for disposing of defective products must be in place and recorded. Defective organic products must be managed under a properly developed disposal procedure. Records must be kept of defective or waste products and the method of their disposal.