



JAS Certification Overview for Re-Packers, Traders, & Distributors

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 Re-Packers and/or Distributors¹ Who Take Possession of the Ingredients/Products

1. **Grading** – Grading is the formal and documented assessment of any product as JAS compliant.
2. **Grading Department²** – The Grading Department acts much like resident organic inspectors whose responsibilities include checking that all organic procedures for receiving, storing, handling, 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) Equivalent or higher than a High school or secondary school degree or similar experience with 2 years of food distribution experience.
 - b) 3 years of food distribution experience.
4. **Standard Operating Procedures (SOP's)³** – SOP's need to be maintained for all activities, including receiving and storing of raw materials, verification of JAS certification

¹ According to JAS, you are considered a Re-Packer (not a Processor) if you are solely distributing, cleaning, freezing, or slightly dehydrating product. This is because the acts of cleaning, freezing, etc does not "transform" the ingredients into something different. For example, cleaning wheat would not be considered processing but milling wheat would.

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

³ While there is no set format, the SOP's will need to describe how each JAS organic product is handled. 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.

and the presence of the JAS seal on all raw materials to be used in repacking, repacking 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 repacking operation, matters related to the verification that compliant raw materials were used during organic handling, matters related to the labeling of the grading, matters related to the shipping or disposal of the consignment after grading⁴, 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 3 – 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. **Raw Materials** – All suppliers of product/ingredients have to be JAS certified in order for the final product to be labeled with the JAS Seal⁵. A copy of the supplier's current JAS certificate must be kept on file by the repacker. 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.
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.

Requirements for Traders Who Do Not Take Possession of the Ingredients/Products

1. **Trader Certification not Required Under JAS** – Traders who do not take possession of the product do not need to be certified under JAS. If the Trader chooses not to be JAS certified then the following applies:
 - a) The final handler of the product must be JAS certified.
 - b) The final handler can label the product with the Trader's ID mark but the name of the handler and the handler's JAS Seal must also appear on the finished product label (for retail packs)
2. **When Traders Need to be JAS Certified** – In order for Traders to use their own ID mark on labels AND list themselves as the manufacturer of the product, the Trader either needs to take possession of the goods and "repack" them OR the final handler of the product needs to be certified under the Trader as an Additional Participant (AP). If the final handler is also a re-packer (ie, does not "process" the goods according to the JAS definition of processing) the producers of the raw materials will also need to be JAS certified. See point 7 above.

⁴ 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.

⁵ QAI offers JAS Producer Group certifications that enables a group of growers to be JAS certified without all growers having to be individually certified. Contact QAI for further details.