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This translation is prepared solely for a reference material to aid in the understanding of Japanese text.

**Questions and Answers on the Japanese Agricultural Standards
for Organic Plants and Organic Processed Foods (Preliminary
Translation)**

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V. Japanese Agricultural Standards

(Q5-1) What does the organic regulation stipulate regarding labeling?

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1. Japanese Agricultural Standard for Organic Plants

(Regarding Article 2)

(Q6-1) What is the “natural recycling function of agriculture”?

(Q6-2) Why have mushrooms been added to the JAS for Organic Plants?

(Q6-3) What kind of plant products are harvested in collection areas?

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(Regarding Article 3)

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(Q7-2) Does the JAS for Organic Plants cover plant products cultivated by hydroponic, rockwool and pot cultures?

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(Q7-4) The JAS for Organic Plants does not apply to manufactured or processed plant products. What do said products cover? Does processing include polishing rice?

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(Regarding Article 4: Fields and Collection areas)

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- (Q8-11) How are plant products handled if fields are affected by the drifting of agricultural chemicals applied to other fields?

(Regarding Article 4: Seeds or seedlings to be used in fields)

- (Q9-1) What are “scion” and “stock”?
- (Q9-2) What does “a part” mean in “full bodies or parts of the plant body”?
- (Q9-3) What kind of seed-propagating plants and vegetative-propagating plants fall under criteria for seeds or seedlings to be used in organic fields? And what are the youngest available seedlings?
- (Q9-4) What are edible sprouts?
- (Q9-5) What kind of seeds or seedlings can be used in fields?
- (Q9-6) What is referred to by “case of a difficulty to obtain”?
- (Q9-7) What is referred to by “case of [...] necessity for maintenance and renewal of varieties”?

- (Q9-8) How should the conformance of seedlings sold as organic seedlings with Paragraph 1 of the criteria for seeds or seedlings used in fields be verified?
- (Q9-9) Why are materials for agricultural use that contain embedded seeds in tape form limited to those from cotton linters? Is the use of materials in sheet rather than tape form permissible?

(Regarding Article 4: Manuring practice in fields)

- (Q10-1) What does “the method utilizing biological functions” mean?
- (Q10-2) What cases falls under “cases where the productivity of fields derived from soil are not maintained or increased only by methods utilizing biological functions?”
- (Q10-3) For purposes of fertilization management, is it acceptable for culture media to which chemosynthesized substances have been added in the manufacturing process or culture media using genetically-modified organisms to be used upon introducing microorganisms from external sources or cultivating microorganisms for processing fertilizer and soil enhancement substances listed in Attached Table 1?

(Regarding Article 4: Fungus spawn, Cultivation sites and Cultivation management in cultivation sites)

- (Q11-1) What kinds of cultivation methods are covered for mushrooms?
- (Q11-2) What kind of fungi is it permissible to use?
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- (Q11-7) What is meant by “case of difficulty obtaining those (substances for producing fungi complying with the criteria prescribed in 1 to 3)” prescribed as criteria for cultivation management in cultivation sites in the Table under Article 4?
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(Regarding Article 4: Control of noxious animals and plants in fields or cultivation sites)

- (Q12-1) What are cultural, physical and biological methods to control noxious animals and plants?
- (Q12-2) What does “selection of species and varieties” mean?
- (Q12-3) What does “adjustment of the cropping season” mean?
- (Q12-4) Is weed suppression in paddy fields through applying rice bran, brokensoybeans, soy pulp, etc. allowed?
- (Q12-5) Is the application of noxious animals and plants weakened using agricultural chemicals under Attached Table 2 to fields allowed for the purpose of introducing predatory animals and parasitic microorganisms?
- (Q12-6) What are cases of imminent or serious threats to crops?
- (Q12-7) What kinds of mulches are permissible to use?

(Regarding Article 4: General management and Management of raising seedlings)

- (Q13-1) Why were the requirements on the general management and management of raising seedlings introduced in standards for production methods with the 2005 revision?
- (Q13-2) Can the agricultural chemicals listed in Attached Table 2 be used for seed sterilization?
- (Q13-3) Is the use of salt water permitted for selecting seeds by specific gravity?
- (Q13-4) Can seawater be applied to fields?
- (Q13-5) Do fields include places for raising seedlings, such as nursery boxes or nursery beds?
- (Q13-6) When raising seedlings using soil from a field that has begun the process of conversion to an organic field and planting the seedlings in the field from which the soil was collected, can said soil be considered to be in conformance with Paragraph 1 of the criteria under Management of Raising Seedlings?

(Regarding Article 4: Management concerning transportation, selection, processing, cleaning, storage, packaging and other post-harvest processes)

- (Q14-1) Do the criteria for “management concerning harvest, transportation, selection, processing, cleaning, storage, packaging and other post-harvest processes” apply until consumers receive the products?
- (Q14-2) What kinds of materials are used for cleaning machines and tools in the processes of “management concerning transportation, selection, processing, cleaning, storage, packaging and other post-harvest processes?”
- (Q14-3) The JAS for Organic Processed Foods stipulate that the use of chemicals other than those in Attached Table 2 to control noxious animals and plants during phases outside of manufacturing and storage of organic processed foods is permissible. In a similar fashion, is it also permissible to use chemicals other than those in Attached Table 4 at facilities where the

processing, etc. of organic plants is conducted?

- (Q14-4) It is stipulated that upon using agricultural chemicals under Attached Table 2 and chemicals under Attached Table 4 for the purpose of controlling noxious animals and plants in processes such as harvest, transportation, selection, processing, cleaning, storage, packaging and other post-harvest processes, the mixing of said chemicals with plants must be prevented. Doesn't the use of carbon dioxide fumigants and metaldehyde (granular formulation) result in mixing with plants?
- (Q14-5) What is quality preservation and improvement?
- (Q14-6) Although ionizing radiation is prohibited, can radiation be used for process management purposes?
- (Q14-7) For the purpose of protecting workers from insect bites, etc., is it permissible to use insect repellent in fields and work areas?
- (Q14-8) It is my understanding that plant quarantine measures will be conducted for wood packing materials for imported goods. How will organic plants be handled under these measures?
- (Q14-9) Do organic plants contain absolutely no residual chemical substances?

(Regarding Attached Table 1)

- (Q15-1) What criteria are items listed in Attached Table 1 based on?
- (Q15-2) How is it determined whether a certain substance can be used or not?
- (Q15-3) What are the criteria for permitted substances only in unavoidable cases for organic plants production?
- (Q15-4) Is the use of composts derived from genetically modified crops permitted?
- (Q15-5) In the 2005 revision, usage criteria for organic by-products of food production industries, etc. permitted for fertilizers and soil improvement substances in Attached Table 1 were revised. Does this mean that some of the organic by-products of food production industries that were previously permitted have become prohibited?
- (Q15-6) In the 2005 revision, the revised Attached Table 1 of the JAS for Organic Plant Products does not contain substances from fish meal powder to steamed bone meal. Is the use of those substances permitted for the production of organic plants?
- (Q15-7) "Those derived from natural sources, or natural sources without the use of chemical treatment" are stipulated under criteria for vegetation ash. For substances used in plants and wood at the production stage, is it necessary to confirm these criteria?
- (Q15-8) When using ion exchange membranes in refining processes for potassium chloride and sodium chloride, is it permissible to use hydrochloric acid, etc. for the purpose of protecting the ion exchange membranes from precipitation?
- (Q15-9) "Shell fossil fertilizers" were removed from the list of permitted materials in

Attached Table 1. Can they no longer be used?

- (Q15-10) What are “trace elements?” Is the use of synthetic trace elements permitted as well?
- (Q15-11) In the criteria for stone meal, what is meant by the phrase “not contaminating the soil with harmful heavy metals or other harmful substances included in sources?”
- (Q15-12) “By-products of sugar industries” are listed in Attached Table 1. What do these by-products refer to? Also, sugar production generally involves a chemical treatment process. The by-products resulting from such manufacturing processes cannot be used, correct?
- (Q15-13) What kinds of substances are included in “other fertilizers and soil improvement substances”?
- (Q15-14) What are the criteria for evaluating whether or not substances fall under “substances which may be used only in cases where the listed substances in Attached Table 1 are not effective for maintaining or increasing soil fertility” in Attached Table 1 of the JAS for Organic Plants?
- (Q15-15) Among “other fertilizers and soil improvement substances,” “those produced by burning, calcining, melting, dry distilling, and saponifying the natural resources and those produced from natural resources without using any chemical methods and recombinant DNA technology” are set forth as “(those) derived from [...] natural sources without the use of chemical treatment.” Does a similar approach apply to “those derived from natural sources without any chemical treatment” under criteria for other materials in Attached Table 1? Also, is the use of pyroligneous acid allowed?
- (Q15-16) Is the use of sewage sludge permitted for the production of organic plants?
- (Q15-17) Is the use of human excrement permitted?

(Regarding Attached Table 2)

- (Q16-1) What is the basis for selecting the substances listed in Attached Table 2?
- (Q16-2) What kinds of substances fall under “biopesticide formulation” in Attached Table 2 of the JAS for Organic Plants?
- (Q16-3) What kinds of substances fall under “biopesticide formulation/ copper wettable powder” in Attached Table 2 of the JAS for Organic Plants?

(Regarding Attached Table 4)

- (Q17-1) How should the control of pests and small animals inside storage warehouses for organic plants be conducted?
- (Q17-2) The following is stipulated under chemicals in Attached Table 4: “Except for the purpose of pests control for plants.” What kind of meaning does this carry?
- (Q17-3) What kind of attractants or repellents for noxious animals and plants can be

used in harvest and post-harvest processes?

(Regarding Attached Table 5)

(Q18-1) Why do criteria for hypochlorous acid water limit brine only to that which has been electrolyzed?

(Regarding Supplementary Provisions)

(Q19-1) Is it permissible to use materials to adjust the viscosity of soil for raising seedlings?

2. Japanese Agriculture Standards for Organic Processed Foods

(Regarding Article 2)

(Q20-1) Why are processing methods limited to that apply physical or biological functions?

(Q20-2) What exactly are processing methods applying physical and biological functions?

(Regarding Articles 3 and 4)

(Q21-1) What revisions were made to the definition of organic processed foods in the 2006 revision?

(Q21-2) How do you meet the requirements for organic production when mixing ingredients?

(Q21-3) In the 2012 revision, a provision was added concerning the usage of non-organic agricultural and livestock products, etc. that limits said use to cases in which it is difficult to obtain organic plants, organic livestock products or organic processed foods that are identical in type to the ingredients being used. What is the reason for this addition?

(Q21-4) Is it permissible to use organic processed alcoholic beverages as organic ingredients in an organic processed food?

(Q21-5) I understand that ingredients are limited to those labeled with Organic JAS logos. But what is the policy on organic plants 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 logos? Is it permissible for a Japanese manufacturer to use them as ingredients by obtaining a relevant certificate?

(Q21-6) Why are criteria for ingredients applied to processing aids?

(Q21-7) Do “ingredients” under Article 4 of the JAS for Organic Processed Foods require grading twice?

(Q21-8) How are “the same categories of plant and livestock products with organic plants and organic livestock products” and “the same categories of processed foods with organic processed foods” in “ingredients” under Article 4

identified?

Examples: “*kurome daizu*” (dark hilum soybeans) and “*shirome daizu*” (white hilum soybeans), green soybeans and soybeans, nonglutinous rice and glutinous rice, tomato ketchup and tomato puree, green tea of middle grade and powdered green tea, “*koikuchi shoyu*” (dark soy sauce) and “*usukuchi shoyu*” (light soy sauce))

- (Q21-9) What exactly are “those derived from the recombinant DNA technology?”
- (Q21-10) How does one confirm whether or not foods underwent ionizing radiation?
- (Q21-11) Is the use of food additives other than those listed in Attached Table 1 permitted in non-organic plants, livestock, marine products and processed foods made from them?
- (Q21-12) Is the use of refined salt with bittern derived from seawater permitted as dietary salt in processing of organic processed foods?
- (Q21-13) Non-organic ingredients should be no more than 5 percent of total ingredients. What is the calculation basis, an ingredient basis or a final product basis?
- (Q21-14) Is the use of ingredients that utilize recombinant DNA technology permitted in processed foods if they are no more than 5 percent of total ingredients in organic processed foods?
- (Q21-15) Is the use of microorganisms cultured with materials other than organic plants, organic processed foods and organic livestock products or materials modified by recombinant DNA technology permitted when manufacturing organic processed foods?
- (Q21-16) Why are organic foods for which organic ingredients constitute no less than 70 percent but below 95 percent not set forth in the JAS for Organic Processed Foods?
- (Q21-17) The use of ionizing radiation for purposes of saving or sanitizing foods, including controlling noxious animals and plants, is prohibited. Is its use for process management purposes permitted?
- (Q21-18) Is the use of chemosynthetic disinfectants or detergents permitted for cleansing plant products as ingredients of organic processed foods?
- (Q21-19) What kind of water is used as an ingredient of organic processed foods? Is the use of disinfectants such as sodium hypochlorite permitted for making well water drinkable?
- (Q21-20) Is the use of detergents and disinfectants permitted for machines and equipment used in the processing process?
- (Q21-21) Are production process managers able to include deoxidants in packing products?

(Regarding Article 5)

- (Q22-1) Why is it necessary to clearly indicate that organic processed foods of plant and animal origin whose generic name is identical to that for organic

processed foods of plant origin are not the latter?

- (Q22-2) What are examples of organic processed foods of plant and animal origin with the same generic names as organic processed foods of plant origin?
- (Q22-3) What kinds of labels are permitted for organic processed foods of plant and animal origin that have the same generic names as organic processed foods of plant origin?

(Regarding Attached Tables)

- (Q23-1) Is the use of items derived from recombinant DNA technology permitted as ingredients for manufacturing food additives?
- (Q23-2) Is the use of calcinated calcium, which is included in existing additives, permitted in processing organic processed foods?
- (Q23-3) Are certified re-packers or certified importers able to fill nitrogen in the tea packaging process?
- (Q23-4) Why were the chemicals listed in Attached Table 2 of the JAS for Organic Processed Foods revised completely?
- (Q23-5) What kind of attractants or repellants for noxious animals and plants can be used in manufacturing, processing, packaging, storage and other facilities?

VI. Labeling

- (Q24-1) Is labeling “organic ingredients are used” permitted for plant products and processed foods without Organic JAS logos?
- (Q24-2) Is labeling “organic tomatoes without agricultural chemicals” permitted?
- (Q24-3) Does a label reading “organic rice” and “organically cultivated rice” comply with the Quality Labeling Standards for brown rice and polished rice?
- (Q24-4) Shall organic plants carry labels consisting only of names??
- (Q24-5) Shall organic processed foods carry labels consisting only of names and ingredients?
- (Q24-6) How are organic plants monitored?
- (Q24-7) Are labeling provisions on organic foods applicable to the food-service industry or home-meal replacement industry?
- (Q24-8) Is certification as a production process manager necessary for selling plant products in accordance with the Organic JAS with consumer cooperation?
- (Q24-9) I produce “*natto*” (fermented soybeans) from organic JAS-certified soybeans. May I sell them as “*natto*” for which organic soybeans were used, without Organic JAS logos but with the claim of “organic *natto*” on a notice board?
- (Q24-10) How should products be labeled, if they contain organic plants and plant products in transition to organic?
- (Q24-11) When labeling Organic JAS logos is using a stamp permitted? Are certified operators able to use Organic JAS logos made by themselves using personal computers?

- (Q24-12) Is labeling “organic XX used” permitted on fresh foods without Organic JAS logos?
- (Q24-13) When packing agricultural processed foods labeled with Organic JAS logos in cardboard boxes with an indication of “organic XX” for shipment, is it necessary to attach Organic JAS logos to the cardboard boxes?
- (Q24-14) May I distribute a free sample of rooibos tea without Organic JAS logos but with a label of “organic rooibos tea?”

VII. Other

- (Q25-1) How are organic products and fields handled if earth and sand flows from the surrounding areas into the organic fields due to natural disaster?

I. Production process manager for organic plants

(Q1-1) What services do certified production process managers conduct?

(A)

They manage or control the production process by each field, make records, grade plant products produced there and attach grading labels, i.e. Organic JAS logos to the products.

(Q1-2) Is certification for each crop necessary for a field for three or four crops?

(A)

The certification is valid regardless of the number of crops a year once the field is certified.

(Q1-3) Is there any effective period for certified fields and collection areas?

(A)

An effective period for certified fields is not set forth in the JAS Law and related regulations. However, following certification, fields must undergo inspection by a registered certifying body at least once a year to confirm that they comply with the criteria for “fields” or “collection areas” as stipulated under JAS. Registered certifying bodies may cancel the certification of production process managers in any of the following cases:

- (1) When a certified operator hands over or displays grade-labeled agricultural or forestry products before the actual grading; does not remove or erase an inappropriate grading label; attaches an inappropriate grading label or any misleading label with the grading label; or violates the provisions on the reuse of packaging materials;
- (2) When a certified operator fails to comply with the technical criteria for certification;
- (3) When a certified operator violates an order by the Minister of Agriculture, Forestry and Fisheries to improve, remove or erase the grading label under the Article 19-2 of the JAS Law;
- (4) When a certified operator fails to comply with a request by the Minister of Agriculture, Forestry and Fisheries to report under Article 20-2 of the JAS Law; makes a false report; or refuses, impedes or avoids an inspection by officials of the Ministry of Agriculture, Forestry and Fisheries under the same Article; and
- (5) When a certified operator has been certified by improper means.

(Q1-4) Are production process managers able to conduct grading as well?

(A)

Grading should be conducted by individuals other than production process managers in order to conduct each activity appropriately. However, if the number of fields is few or the area is limited, the same person may conduct both activities subject to the registered certifying body's permission.

(Q1-5) Please provide the calculation basis for the necessary number of production process managers who are able to manage or control based on the number of fields and the degree of scattering of fields.

(A)

The necessary number depends on the number of fields and the degree of scattering of the fields. Production process managers shall be provided no less than the number of all fields divided by the number of fields for which one production process manager is able to manage or control the production process for one year.

(Q1-6) How is a management record of a production process confirmed to be of the relevant production lot?

(A)

It is confirmed by checking the relevant lot against the production process management record.

(Q1-7) Is it possible to attach Organic JAS logos to plants harvested or cultivated before production process managers are certified?

(A)

Registered certifying bodies are able to certify production process managers even during the period of cultivation or after the harvesting of plant products. In such cases, the registered certifying bodies shall inspect the production management system 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 regular certification. If plant products have been cultivated or have already been harvested, the whole production process management system shall be inspected, including whether or not those plant products comply with the Organic JAS, based on production process management records and storage conditions.

Certified production process managers are able to grade and attach Organic JAS logos to the plants held in storage after harvest or during cultivation at the time of certification based on the Organic JAS system.

II. Production process manager of organic processed foods

(Q2-1) Is certification as a production process manager necessary to make vegetable salad using organic vegetables in a supermarket and attach Organic JAS logos to them?

(A)

When no less than one kind of plant product is cut and mixed into one product such as organic vegetable salad, the product is regarded as an organic processed food. The processor at the supermarket shall be certified as a production process manager in order to sell them with Organic JAS logos.

(Q2-2) Should the same one person manage the production process? If the production process management is shared by a few persons, should all of them be certified as operators?

(A)

1. The production process should not always be managed by the same one person. Two ways to manage are as follows:
 - (1) All persons who manage the production process of organic plants compose a group and are certified as production process managers. Such groups include:
 - i) A group of farmers or rice polishing facilities; and
 - ii) A group of manufacturing or packaging factories. The “names and addresses” of all members shall be specified in the certification application in accordance with Article 28, Paragraph 1 of the Ministerial Ordinance.
 - (2) Farmers of organic plants or manufacturers of organic processed foods are certified as production process managers, manage a part of the production process by themselves and subcontract the other part of production process to others. Certified farmers or manufacturers shall attach Organic JAS logos to the products in this case as well.
2. The production process is managed under the responsibility of the production process managers, irrespective of whether the whole process is certified or not, while farmers and manufacturers are certified by each field or office. Therefore, all fields or offices involved in the production process shall be specified at the time of certification as the fields or offices that the certified operators should manage or control the production process. (In applications for certification, all the fields and offices involved in the production processes shall be specified in the “name and location of fields or places” in accordance with Article 28, Paragraph 3 of the Ministerial Ordinance. Any amendments made to fields or offices involved in the production process are to be notified to the registered certifying body to make changes to the certification.)

(Q2-3) Should certified overseas production process managers of organic processed foods procure ingredients with Organic JAS logos to produce and sell organic processed foods?

(A)

Organic plants and organic processed foods of plant origin certified in a country designated as having a grading system equivalent to Japan's system by a Ministerial Ordinance under Article 15-2, Paragraph 2 of the JAS Law, and certified according to that grading system and arrangements between that country and Japan, are deemed equivalent to those certified under the JAS with respect to the standards of production and distribution handling in that country. Therefore, such certified organic plants and organic processed foods of plant origin can be labeled with Organic JAS logos by certified importers when they are imported into Japan. A certified overseas production process manager of organic processed foods in a country with a grading system equivalent to the grading system under the JAS as designated by an Ordinance of the Ministry of Agriculture, Forestry and Fisheries under Article 15-2, Paragraph 2 of the JAS Law can procure organic plants or organic processed foods of plant origin certified by the grading system of that country (including those graded in a third country according to arrangements between such countries and Japan) and use them as ingredients to produce or process organic processed foods.

(Q2-4) Is it possible for an overseas operator certified by the grading system of a foreign country which Japan recognizes as equivalent to grade plants and processed foods of plant origin and attach Organic JAS logos to them itself according to the system of the country and the arrangement between Japan and the country?

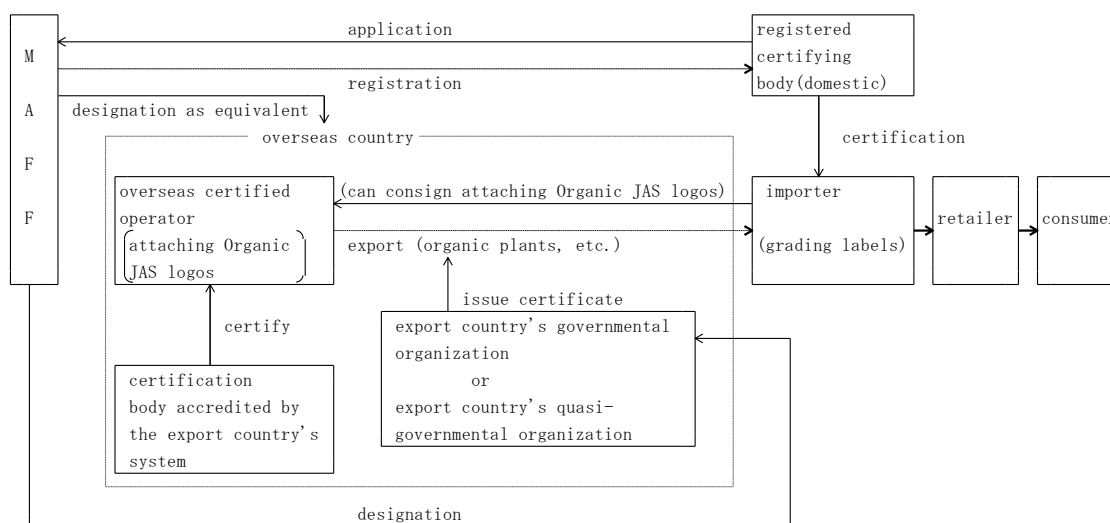
(A)

1. An overseas operator certified by the grading system of a foreign country which Japan recognizes as equivalent (hereinafter referred to as "overseas certified operator") can't attach Organic JAS logos to plants and processed foods of plant origin graded by the grading system of the country itself.

According to provisions under Article 15-2 of the JAS Law, only a certified importer in Japan can grade labels to plants and processed foods of plant origin graded by the grading system of a foreign country which Japan recognizes as equivalent.

2. In the case that a certified importer makes a consigning contract about attaching Organic JAS logos with an overseas certified operator, the operator accepting the consigning contract can attach Organic JAS logos to its products in accordance with the consigning contract.

(Reference)



MAFF: Ministry of Agriculture, Forestry & Fisheries

(Q2-5) If organic *natto* (fermented soybeans) is sold with sauce and mustard, should sauce and mustard as well as *natto* be regarded as organic processed foods?

(A)

When organic *natto* is sold with sauce and mustard, but without being mixed together, the sauce and mustard are regarded as other processed foods attached to the organic *natto*. In other words, if *natto* itself is an organic processed food, it is able to carry a label stating “organic *natto*.”

Labeling examples include:

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

Note 1: a) applies when both mustard and sauce are not organic foods.

Note 2: b) applies on the condition that certified operators shall attach Organic JAS logos to the “organic sauce.”

III. Re-Packers

(Q3-1) Who should be certified as re-packers?

(A)

1. Re-packaging generally means “further dividing products into smaller units.” This means changing their shapes into smaller ones by cutting or sorting. It also includes changing the products distributed in smaller to bigger units by pulling them together

in boxes or bags.

2. The JAS Law stipulates that certified re-packers are those who re-attach Organic JAS logos to re-packed products at levels such as wholesale, brokerage or retail.
3. Please note that certified re-packers shall not mix various kinds of foods and re-pack them. Mixing is regarded as a form of processing because a new characteristic is added to the products. Certified re-packers are able to re-pack organic vegetable sets due to consumers separately consuming assorted vegetables and the characteristics of the vegetables being maintained.
4. Certified re-packers can mix the same kind of processed foods and re-pack them. In these cases, such mixing is not considered to be adding a new characteristic to the product. However, the blending of tea to improve its taste, for example, is regarded as adding a new characteristic to the product, and therefore requires the certification of production process managers of processed foods.
5. Moreover, the act of using ethylene to ripen bananas and kiwi fruits labeled with the JAS logo is conducted by a certified operator. However, in the event that the use of ethylene to ripen said foods is not accompanied by re-packing, it is not necessary to re-attach the JAS logo to those foods.

(Q3-2) Is certification necessary for re-packing foods in a supermarket?

(A)

Two cases are considered below:

- (1) Case 1: Certification as re-packer is not necessary; Certification for a re-packer is not necessary for re-packing organic plants in a supermarket backyard and posting Organic JAS logos cut off from the empty box in close proximity to the re-packed plants if the identities of organic plants and the attached Organic JAS logo are ensured by setting up a corner for organic plants and preventing them from mixing with other plant products. This Case 1 includes: a) piling up the organic plants taken out of from the boxes; b) putting them in dishes; c) packing them in bags or containers; d) selling them in pieces; and e) wrapping cut foods. Please note that a label stating “organic” on the containers or the package of re-packed plant products is prohibited. “Organic” labels should be always identified with Organic JAS logos. Please attach an “organic” label in places close to the posted Organic JAS logo using POP displays, etc. if you are not certified as a re-packer.
- (2) Case 2: Certification as re-packers is necessary; Certification as re-packers is necessary if a label stating “organic” is attached to containers or packages of re-packed plant products, including those prepared and cut for sale. This is because Organic JAS logos should be newly attached to those products.

(Q3-3) Is certification as production process manager or re-packer of organic processed foods necessary for polishing brown rice with Organic JAS logos or mixing a few kinds of organic rice and attaching Organic JAS logos to the products?

(A)

Certification as re-packers is necessary because grading labels are to be re-labeled in the above case. Please note that certification as re-packer is not necessary when Organic JAS logos is not re-attached on re-packed bags. The latter includes cases when brown rice with an Organic JAS logo is polished and sold to consumers face to face.

(Q3-4) Can the same party be in charge of re-packing and grade-labeling activities?

(A)

For the proper operation of each activity, it is recommended that re-packing and grade-labeling be performed by different parties. With the approval of a registered certifying body, however, both activities may be performed by the same party.

(Q3-5) Can a retailer that has not obtained re-packer certification engage in the task of removing the wilted portions off of organic spinach?

(A)

The task of simply removing wilted portions does not fall under re-packer operations. As such, non-certified operators are also permitted to engage in this task.

IV. Importers

(Q4-1) Can importers and re-packers consign to warehousemen activities as storing, re-packing, and attaching grading labels to imported or re-packed products?

(A)

It is prohibited to consign the attaching of grading labels to uncertified warehousemen since a grading label must be attached by certified operators themselves. If it is necessary to consign storage, re-packaging or grade-labeling to a warehouseman, the importer or re-packer must enter into a cooperative agreement with the warehouseman under which they will undergo an examination together to be certified as a certified importer or re-packer. To be certified in this way, the parties have to complete the application form documents that identify the name of the group as well as the individual names of the importer or re-packer and warehouseman in the names or titles and addresses set forth in Article 32, Paragraph 1 and Article 34, Paragraph 1 of the Ministerial Ordinance.

(Q4-2) What packaging activities can certified importers perform?

(A)

Certified importers can attach grading labels to imported Specified Agricultural and Forestry Products or their packages, containers and invoices. In principle, the grading labels are attached to packages or containers as they arrive in Japan. However, if the imported containers and packages are broken or damaged, or the contents need to be re-packaged or transferred to equivalent containers due to otherwise being unsuitable for distribution in Japan, the grading labels can be attached to the new re-packaged containers or packages. Certified importers themselves cannot re-pack, blend, polish or process imported Specified Agricultural and Forestry Products.

(Q4-3) If an importer who imports plants or processed foods of plant origin labeled as “organic” in a language other than Japanese does not attach a grading label as organic in the Japanese language to such imported products, does the importer need to be a certified importer?

(A)

Imported plants and processed foods labeled as “Organic” or “ORGANIC” in English can be confused with “オーガニック XX” or “XX (オーガニック)” (meaning “organic” in Japanese) set forth in Article 5 of the JAS for Organic Plants and Article 5 of the JAS for Organic Processed Foods. In such cases, therefore, the importer is required to be a certified importer and attach Organic JAS logos to the imported products. This also applies to products labeled as “organic” in any other language in such a way that could be misleading to consumers in their choice of products.

(Q4-4) Are organic foods produced in Country B in accordance with the system of Country A and imported via Country A able to carry Organic JAS logos with the certification of Country A? The system of Country A is approved as being equivalent with the Organic JAS system, while that of Country B is not.

(A)

Certified importers are able to import organic plants and organic processed foods of plant origin that were graded under the overseas systems and grade labels to the products if the following three conditions are satisfied: a) Japan approved the system of exporting countries for the organic products as being equivalent with the Organic JAS system; b) the products are produced and graded in those equivalent countries; and c) the certificates issued by the governmental organizations or quasi-governmental organizations of the equivalent countries or their copies are attached to the products. Certified importers are not able to grade labels to organic products made in Country B due to Country B not having been approved as having an equivalent system.

(Q4-5) When importing foods graded as “organic” in Country A via Country B, both of which are recognized as having a grading system equivalent to Japan, which country’s certificate is required in order to attach Organic JAS logos to the foods in question?

(A)

1 When a Specified Agricultural and Forestry Product (organic plant or organic processed food of plant origin) produced and graded as organic in Country A is imported to Country B, acquires a new characteristic in Country B and is exported to Japan, a certificate shall be issued by the governmental organizations or quasi-governmental organizations of Country B as the exporting country to Japan.

2 In the case that the product is imported into Country B but does not acquire any new characteristics there, and is then exported from Country B to Japan, either of the following certificates is required in order to be able to attach Organic JAS logos to the products.

(1) Certificate issued by the governmental organizations or quasi-governmental organizations of Country A, or

(2) Certificate issued by the governmental organizations or quasi-governmental organizations of Country B and a document that contains the name and address of the certifying body in Country A that certified the production process manager responsible for the concerned Specified Agricultural and Forestry Product.

An example of the document that contains the name and address of the certifying body in Country A is a certificate of transaction issued by the certifying body in Country A between the production process manager in Country A and the operator in the Country B or a certificate, etc. for a production process manager in Country A. In the case of a certification, etc. in order to specify a specified agricultural and forestry product exported to Japan as the above specified agricultural and forestry product, a document such as an invoice issued on exporting from Country A to Country B is also necessary.

3 On determining whether the product has acquired new characteristics, blending of different varieties of tea, etc. in order to improve its quality is regarded as an act of adding a new characteristic. Thus a certificate issued by the governmental organizations or quasi-governmental organizations of Country B is required.

(Q4-6) Upon using foods graded “organic” in a country recognized as having a grading system equivalent to Japan as ingredients for organic processed foods within Japan, is it possible to transport the graded foods directly to the production factory for the organic processed foods without going through an acceptance and storage warehouse for imported goods using the same containers used upon importing the graded foods and have a certified importer attach Organic JAS logos to the organic foods to serve as the ingredients for the organic processed foods at the factory?

(A)

1. Direct shipment to the production factory for organic processed foods is permissible provided that said factory fulfills conditions for acceptance and storage facilities for imported goods as set forth in I. under the Technical Criteria for the Certification of Importers of organic plants and organic processed foods of plant origin.

The certified importer shall include the factory in the range of certifying as “a facility for acceptance and storage of imports” of above technical criteria for certifying.

2. Since an ownership of the imported goods transfers in the production factory for organic processed foods, the importer shall provide the production factory with the specified agricultural and forestry products after confirming that the content of the certificate issued by the governmental organizations or quasi-governmental organizations of the country which Japan recognizes as equivalent is the same as the quantity of the specified agricultural and forestry products described in the invoice, etc. and attaching Organic JAS logos to those products.

In the case that a certified importer consigns attaching Organic JAS logos to an overseas certified operator in exporting country, the certified importer shall provide the production factory after confirming that the Organic JAS logos attached to the imported specified agricultural and forestry products are appropriate by checking the above certificates, etc.

(Q4-7) What is “the part of the service concerning grading labels” which a certified importer can consign to an operator certified by the grading system of a foreign country which Japan recognizes as equivalent?

(A)

“The part of the service concerning grading labels” which a certified importer can consign to an operator certified by the grading system of a foreign country which Japan recognizes as equivalent is the service of attaching organic JAS logos to specified agricultural and forestry products.

(Q4-8) What is the case that an operator who is certified by the grading system of a foreign country which Japan recognizes as equivalent makes a consigning contract with a certified importer and attaches Organic JAS logos to specified agricultural and forestry products before exporting them to Japan?

(A)

1. A certified importer imports specified agricultural and forestry products produced by an operator who is certified by the grading system of a foreign country which Japan recognizes as equivalent (hereinafter referred to as "overseas certified operator"), confirms contents described in certificates and attaches Organic JAS logos. In the case that an overseas certified operator would like to attach Organic JAS logos itself, a certified importer can make a consigning contract with the overseas certified operator and import products with Organic JAS logos.
2. In this case, in order to secure that the overseas certified operator shall attach Organic JAS logos appropriately, the overseas certified operator shall complete a curriculum to understand key considerations about attaching Organic JAS logos, which can be substituted by understanding with website, e-mail, etc. and the certified importer shall confirm that the overseas certified operator's service of attaching organic JAS logos by making the overseas certified operator report its service as necessary.
3. Since it was said that the previous method that a certified importer attached Organic JAS logos on importing organic products to Japan prevented a smooth international trade, above method is established in order to simplify the procedure. A certified importer shall understand the meaning of simplifying the procedure and in the case that an overseas certified operator would like to attach Organic JAS logos itself the certified importer shall consign attaching Organic JAS logos unless there are justifiable grounds not to permit such consignment.

(Q4-9) In the case that a certified importer makes a consigning contract about attaching Organic JAS logos with an operator who is certified by the grading system of a foreign country which Japan recognizes as equivalent, what is the content of the consigning contract?

(A)

An example of the consigning contract is as follows. A certified importer shall stipulate the content of the consigning business in the grading label rules in advance.

The contract for the consignment about attaching JAS logos
(Example for the case that The Second Party
is an operator in the EU member states)

A Japanese importer certified by a Registered Certifying Body based on the provision of Article 15-2 of the Law Concerning the Standardization and Proper Labeling of Agricultural and Forestry Products (Law No. 175 in 1950) (hereinafter referred to as "The First Party") and an organic operator certified under the EU organic rules in the EU member states (hereinafter referred to as "The Second Party") shall make a contract for the consignment about attaching Organic JAS logos (hereinafter referred to as "logos") to organic plants and organic processed foods of plant origin (limited to ones which are graded under the EU organic rules, hereinafter referred to as "organic foods") as follows:

(Businesses for the consignment)

Article 1 The First Party shall consign the following businesses (hereinafter referred to as "businesses for the consignment") to The Second Party and The Second Party shall accept these businesses.

- (i) The Second Party shall appoint a person in charge of attaching logos and ask the person to understand the types of organic foods attaching logos, the form of logos and the way of writing invoices, etc. by materials specified by The First Party.
- (ii) The Second Party shall attach logos whose form is specified by The First Party or which are sent by The First Party to the organic foods shipped to The First Party.
- (iii) The Second Party shall send invoices written with names, lot numbers, quantities and shipping dates of organic foods attaching logos to the organic foods shipped to The First Party and keep these copies.
- (iv) The Second Party shall promptly respond to inquiry about attaching logos from The First Party.

(Cost)

Article 2 There shall be no charge of fees with respect to the business of consignment herein.

(Period and renewal)

Article 3 The period of the contract shall be from DD, MM, YY to DD, MM, YY.

If The First Party or The Second Party doesn't apply three months before the expiration of the period of the contract, the contract shall automatically be extended for another year under the same conditions as the contract.

(Subcontract)

Article 4 If The Second Party needs to subcontract all the businesses for the consignment to the third party (limited to the operator certified by the EU organic rules in EU member states), The Second shall obtain approval from The First Party about the subcontract in advance. In addition, if The Second Party obtains approval from The First Party and subcontracts to the third party, The Second Party shall make the third party comply with the same obligations as The Second Party's and shall be fully responsible for the third party's actions.

(Confidentiality)

Article 5 The First Party and The Second Party shall not reveal the confidential information obtained through the businesses for the consignment to the third party and shall not use the information aside from the purpose of the businesses for the consignment both for the duration of the contract and thereafter.

(Liability for defect warranty)

Article 6 If there is a heavy defect in The Second Parties' implementation of the contract, The Second Party shall bear all the cost of the defect.

(Termination)

Article 7 If either of The First Party or The Second Party falls under any of following items, the other party can terminate the contract without a formal demand or other procedures:

- (i) when the Certifying Body suspends or withdraws the certification either of The First Party or The Second Party,
- (ii) when either of The First Party or The Second Party violates the contract and doesn't conduct corrective actions after a formal demand for some significant period of time,
- (iii) when there is a heavy issue which makes continuation of the contract difficult like a heavy defection to the other party, etc.

(Discussion)

Article 8 Any issue regarding matters not specified in the contract or the interpretation of the terms and conditions of the contract, etc. shall be resolved by discussions between The First Party and The Second Party.

As evidence of the content of this Agreement, two original copies shall be created and The First Party and The Second Party shall retain one.

XX, XX, 2013

The First Party Address
 Company Name
 Representative Name

The Second Party Address
 Company Name
 Representative Name

(Q4-10) In the case that a certified importer makes a consigning contract about attaching Organic JAS logos with an operator who is certified by the grading system of a foreign country which Japan recognizes as equivalent, shall the overseas operator pay a contract fee for the certified importer?

(A)

Since the service of attaching Organic JAS logos which a certified importer consigns to an operator certified by the grading system of a foreign country which Japan recognizes as equivalent is the action which should be originally conducted by a certified importer and which the overseas certified operator conducts instead of the JAS certified importer, the certified importer shall not impose a financial burden on the overseas certified operator who enters in the consigning contract.

(Q4-11) In accordance with the technical criteria for certifying importers of organic plants and organic processed foods of plant origin, what should be described as “matters for supervising a consignee” in the rules of grading label in the case that an importer consigns attaching Organic JAS logos to an overseas operator?

(A)

“Matters for supervising a consignee” are necessary matters that a certified importer confirms that the service of attaching Organic JAS logos which the certified importer consigns is conducted appropriately and makes the report as necessary.

To be specific, following matters shall be stipulated:

- (i) matters relating to the direction regarding the methods of attaching Organic JAS logos appropriately and keeping the record,
- (ii) matters relating to the report of the record of attaching Organic JAS logos,
- (iii) matters relating to the report of keeping the record of attaching Organic JAS logos.

Since supervising a consignee shall be the minimum necessary in light of the purpose of securing attaching Organic JAS logos appropriately, supervising shall not mean that a consignee (an overseas operator) bear an unfair burden.

(Q4-12) In the case that a certified importer makes a consigning contract about attaching Organic JAS logos with an operator who is certified by the grading system of a foreign country which Japan recognizes as equivalent, what curriculum shall a staff who assists a person in charge of grading labels complete?

(A)

1. In the case that a certified importer makes a consigning contract about attaching Organic JAS logos with an operator who is certified by the grading system of a foreign country which Japan recognizes as equivalent (hereinafter referred to as "overseas certified operator"), the overseas certified operator shall understand key considerations for a consignment contract about attaching Organic JAS logos and conduct a service of attaching Organic JAS logos appropriately.

Thus, it is stipulated in the Technical Criteria for Certifying Importers of Organic Plants and Organic Processed Foods of Plant Origin that a person who has completed the curriculum on grading labels shall be assigned at the overseas certified operator as the staff who assists the staff in charge of grading labels.

2. Key considerations about attaching Organic JAS logos for the staff who assists the staff in charge of grading labels are as follows:

(i) To attach Organic JAS logos whose form is specified by the certified importer who makes the consigning contract only to the specified agricultural and forestry products exported to the certified importer.

(ii) To report the record of attaching Organic JAS logos to the certified importer who makes the consigning contract and keep the record.

The staff who assists the staff in charge of grading labels shall complete "the curriculum on grading label" in order to understand above key considerations.

3. The curriculum on grading labels could be completed by making the staff who assists the staff in charge of grading labels read thoroughly and understand following key considerations with web-site, e-mail, etc.

**Key considerations for a consignment contract
about attaching Organic JAS logos**

The requirement of the curriculum about grading labels prescribed in the Section V of “The Technical Criteria for Certifying Importers of Organic Plants and Organic Processed Foods of Plant Origin” could be completed by reading thoroughly and understanding following items.

I. The types of organic products to which could be attached Organic JAS logos through consignment contracts with JAS certified importers

- (i) Organic plants (including fungi)
ex.) vegetables, fruits, grains, fresh coffee beans, sugar canes, fungi

- (ii) Organic processed foods of plant origin (except for the organic processed products of which weight of livestock products is more than 5%)
ex.) processed vegetables, processed fruits, processed grains, coffee beans, sugar, black chocolate, tea

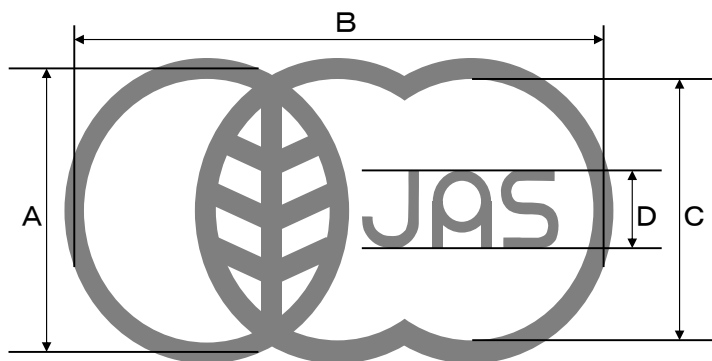
Note) Other types of organic products than those above (i) and (ii) shall not be attached Organic JAS logos through consignment contracts with JAS certified importers.

II. The method to attach Organic JAS logos to organic products

- (i) Appointment of a person in charge of attaching Organic JAS logos
In order to enter into a consignment contract with JAS certified importers about attaching Organic JAS logos, a person in charge of attaching Organic JAS logos shall be appointed.
The person shall understand the types of organic products attaching Organic JAS logos, the form of Organic JAS logos and the way of writing reports to JAS certified importers.

- (ii) Confirmation of the form of Organic JAS logos
Organic JAS logos are as the diagram below indicates. The names of registered certifying bodies who have certified those certified importers shall be described. Thus, those Organic JAS logos whose forms are specified by those certified importers shall be attached.

Diagram: The format of the JAS logo



Name of RCB

- (1) A is more longer than 5mm.
- (2) B is twice as long as A. D is three-tenths of C.
- (3) The height of names of RCBs is the same as D.
- (4) The names of RCBs can be described as abbreviated names.
- (5) The color of the JAS logo is not specified.

Note) In the case of entering into multiple consignment contracts with multiple JAS certified importers, those certified importers could sometimes have different names of those registered certifying bodies.

Thus, after confirming those forms of Organic JAS logos specified by those certified importers, Organic JAS logos shall be attached.

(iii) Operations after attaching Organic JAS logos (reports to JAS certified importers)

In the case of attaching Organic JAS logos to organic products shipping to JAS certified importers, documents for each lot written with names, quantities and shipping dates of those organic products attaching Organic JAS logos (if feasible, lot numbers, weights, etc. are included) should be shipped with those organic products and reported to those certified importers. Those copies should also be kept.

Those contents of shipped documents could be kept in electronic form.

For reference, a format example of a report to a certified importer is attached as follows. However in the case that the number of attached JAS logos is indicated on an invoice (i.e. by stating that the number of attached JAS logos is the same as quantity of organic products or if the number is different, stating a specific number of attached JAS logos), the report is not necessary to be shipped separately.

Table: Report to JAS Certified Importer (Example)

To JAS certified importer					
Quantity of attached JAS logos					
Invoice No. : ABCD-123					
Commodity Name	Lot Number	Organic Products		JAS Logos	
		Quantity	Weight	Number of Attaching	Date of Attaching
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 operators would like to inform certification numbers, etc. of the importers, they could be written here.					
Date					
Signature of the person in charge of attaching JAS logos					

III Supplemental

Overseas certified operators who contract with JAS certified importers can attach those country's Organic logos, etc. to their organic products in addition to attaching Organic JAS logos.

V. Japanese Agricultural Standards

(Q5-1) What does the organic regulation stipulate regarding labeling?

(A)

1. The regulation prohibits the labeling of “organic plants,” “organic processed foods of plant origin” or any misleading labeling when Organic JAS logos is not attached by certified operators.
2. Imported products labeled as being organic or with any misleading label shall not be sold, entrusted for sale or displayed as either organic plants or organic processed foods without Organic JAS logos.

(Q5-2) How are “overseas countries as those have an equivalent grading system to the grading system under the Japanese Agricultural Standard” in Article 15-2, Paragraph 2 of the JAS Law decided and made public?

(A)

The Ministry of Agriculture, Forestry and Fisheries is responsible for equivalency evaluations upon requests from interested countries and notifications by the Ministerial Ordinances on a case-by-case basis. Names of equivalent countries are also available on the websites of the Ministry of Agriculture, Forestry and Fisheries. The “equivalent” grading system of another country does not mean that it is identical to the Organic JAS system. The integrity of the Organic JAS system is maintained through setting the terms of exports to Japan for crucial differences between both grading systems.

1. Japanese Agricultural Standard for Organic Plants
(Regarding Article 2)

(Q6-1) What is the “natural recycling function of agriculture?”

(A)

The “natural circulation function of agriculture” is defined as “the function on which plant production activities depend and promote the circulation of substances through the medium of organisms in nature” in the Basic Law for Foodstuffs, Agriculture and Farming Areas (Law No.106, July 16, 1999).

(Q6-2) Why have mushrooms been added to the JAS for Organic Plants?

(A)

There were no criteria to confirm that mushrooms were grown by specific production methods. Therefore, it was difficult:

- a) for producers to ensure the reliability of the value-added indicated; and
- b) for consumers to choose products with value-added.

Under these circumstances, mushrooms were added to the list of Organic Plants in the 2006 revision in response to requests from both producers and consumers to bring common wood-decaying mushrooms, such as shiitake fungi, under regulation.

(Q6-3) What kind of plant products are harvested in collection areas?

(A)

Such products include plant products such as edible wild plants, mushrooms and raspberries, etc. that grow naturally in fallow fields or paths. Mountains and forest lands that are cultivated and managed are not collection areas but fields.

(Q6-4) Why are naturally grown products subject to the Organic JAS?

(A)

There is demand for the distribution and consumption of products that are not affected by agricultural chemicals and are differentiated as organic. Conversely, naturally-grown products may be affected by agricultural chemicals.

(Regarding Article 3)

(Q7-1) Other materials that are used to soils, plants or fungi” are stipulated as being “prohibited substances.” What kind of substances do these specifically refer to?

(A)

1. The revision of the Organic JAS of 2005 added “other materials that are applied to

plants or soils” to prohibited substances in addition to fertilizers and agricultural chemicals (except natural substances or materials derived from natural substances that have not undergone chemical treatment).

2. Prior to this revision, in addition to fertilizers and agricultural chemicals, materials to which chemosynthesized substances are added and are likely to contaminate organic plants or fields by being applied to or brought into contact with plants or soils had been prohibited as a matter of policy. This revision clarified this issue in order to thoroughly notify concerned parties such as certified operators.
3. Other materials prohibited from use when they are treated with chemosynthesized substances include seed tapes, chain pots and mulches intended to be plowed into the soil, pollen extenders that are directly applied to plants and snow-melting substances sprayed on fields.
4. However, materials intended to be removed after use, such as plastic mulches and plastics, poles, nets and binding tape for greenhouses, do not fall under prohibited substances.

(Q7-2) Does the JAS for Organic Plants cover plant products cultivated by hydroponic, rockwool and pot cultures?

(A)

Plant products cultivated by hydroponic and rockwool cultures do not comply with the Organic JAS due to the Organic JAS stipulating as its production principle “exercising farmland productivity derived from original soils.” Accordingly, those products shall not carry Organic JAS logos nor be labeled as organic plants in compliance with the Organic JAS. However, pot cultures do comply if the soil of a certified field is used and the product is cultivated in the certified field.

(Q7-3) Does the Organic JAS cover *wasabi* cultivated in gravels?

(A)

Wasabis cultivated in gravels, whose roots are fixed as far as possible towards stones and are without soil, are not organic plants due to not meeting the organic production principle of “exercising farmland productivity derived from original soils.” Those *wasabis* shall not carry Organic JAS logos nor be labeled as organic. *Wasabis* harvested in fields, however, are subject to the Organic JAS.

(Q7-4) The JAS for Organic Plants does not apply to manufactured or processed plant products. What do said products cover? Does processing include polishing rice?

(A)

The judgment of manufacturing or processing is done based on conventional norms, taking into account treatments of plant products. While “manufacturing” means

creating something new and different in nature from the ingredients used, “processing” means adding new characteristics to the ingredients without changing their nature. Examples of processing include heating, flavoring, grinding, squeezing juice and salting, but do not include simple cutting, transporting and drying products for storage. Please note that dried strips of radish, dried persimmons, dried sweet potatoes and herbal tea (dried herb) are considered processed foods, while polished rice is subject to the JAS for Organic Plants.

(Q7-5) When a farmer processes organic plants produced by himself/herself and sells them as organic processed foods, is it necessary for that farmer to be certified as a production process manager for organic processed foods as well as for organic plants?

(A)

In a such case, it is necessary for the farmer to be certified as a production process manager for both organic plants and organic processed foods.

(Q7-6) Is certification as a production process manager for organic processed foods necessary to obtain if production process managers for organic plants grade tea leaves as dried green tea or if production process managers and re-packers for organic plants label rice bran as organic?

(A)

1. Heating fresh tea leaves by the fire is regarded as a preparation process for plants since it is necessary to immediately dry fresh tea leaves after harvest in order to prevent color changes. Accordingly, certified production process managers for organic plants are permitted to label dried green tea leaves as organic and ship them to operators who process such leaves in accordance with the JAS for Organic Plants. Certification as a production process manager for organic processed foods is necessary to label dried green tea as organic in accordance with the JAS for Organic Processed Foods in the following cases: a) Attaching an organic label to dried green tea to be directly sold to consumers; and b) Attaching an organic label to dried green tea prepared from tea leaves purchased by other farmers. Additionally, where English tea is concerned, farmers of said tea need to become certified production process managers for organic processed foods even in cases where they personally ferment and/or otherwise process the tea leaves that they picked.
2. Rice bran is a by-product of polished rice, which is a fresh food. Production process managers for organic plants who produced rice bran or re-packers are able to label the products as organic in accordance with the JAS for Organic Plants.

(Regarding Article 4: Fields and Collection areas)

(Q8-1) At which point is the organic production management of fields considered to have been started?

(A)

1. Organic production management for perennial plants can be considered to have started at the point when the use of prohibited substances is terminated.
2. There are two cases where organic production management for plants other than perennial plants can be considered to have started: a) at the point when the use of prohibited substances is terminated where there are no cultivated crops in the fields at the time of such termination; and b) at the point when the crops are harvested (or reaped) where there are crops when the use of prohibited substances is terminated because the crops cannot be considered to have been placed under organic management.

(Q8-2) At which point is the production of plants in newly-developed fields or fields not used for cultivation considered as having started?

(A)

In cases where work such as mowing, tilling or inserting compost for cultivation purposes; sowing or planting crops; or sowing green manure is carried out, and said work links to the planting of crops to be managed organically, the production of plants can be considered as having started. In cases where planting was not carried out despite mowing and tilling having been conducted earlier, the production of plants cannot be considered as having started at the point that mowing and tilling was conducted.

(Q8-3) Is it permissible to mutually alternate between organic and conventional farming in the same fields?

(A)

The transition from conventional to organic farming is based on the premise that organic farming will continue to be implemented following the transition. As indicated in the Guidelines for the Production, Processing, Labeling and Marketing of Organically Produced Foods (hereinafter “*the Codex Guidelines*”), organic farming and conventional farming may not be repeatedly alternated between within the same fields. This prohibition shall not apply to cases, however, where the alternation is judged to be temporary by a registered certifying body based on the occurrence of natural disasters, field maintenance, and other unavoidable circumstances.

(Q8-4) How are organic certified fields treated in the land improvement project area accompanying land readjustments?

(A)

The organic certification of fields is not valid after the land improvement project accompanying land readjustments, and new certification is required. The exception is simple land improvement projects such as removing borders. The same rule applies to cases when the soil of the certified field is stored before the land improvement project and put it back into the field after the project.

(Q8-5) The JAS for Organic Plants stipulates that “necessary measures shall be taken in fields so as to prevent prohibited substances from drifting and flowing in from surrounding areas.” What kinds of criteria are applied?

(A)

Measures to compartmentalize are necessary in order to prevent prohibited substances from drifting and flowing. Each determination is left to each registered certifying body due to situations differing depending on field conditions. Criteria include: providing a distance between organic and conventional fields; dividing fields by roads; establishing windbreak nets, maintaining a buffer zone by cultivating crops at the boundary; and maintaining a boundary to prevent rainwater flowing from conventional fields into the organic field.

(Q8-6) How should one deal with a case where a field falls under areas subject to the aerial spray of agricultural chemicals?

(A)

Please file a complaint to the responsible organization in the district so that the field is not subject to aerial spray. Necessary measures should be taken to prevent the flowing of agricultural chemicals.

(Q8-7) How do registered certifying bodies confirm whether or not measures to prevent the drifting of agricultural chemicals by aerial spray are taken?

(A)

Each registered certifying body judges whether or not proper measures are taken to prevent agricultural chemicals from drifting into fields based on geographical conditions, wind direction and how aerial spraying is applied. This also applies fields outside the aerial chemical spraying area, as spraying might be applied nearby.

(Q8-8) What are appropriate measures to prevent prohibited substances from flowing into water, especially into irrigation water?

(A)

No specific measures are necessary to prevent prohibited substances from flowing into water in the following cases: a) Water taken from rivers or irrigation channels other than waterways to serve as drainage; b) Well water; and c) Water from marshes. Water from conventional fields shall be treated to prevent prohibited substances from flowing into organic fields through temporary storage in purification paddy fields or other appropriate measures.

(Q8-9) What kinds of plant products are harvested from perennial plants?

(A)

Perennial plants are crops for which all or a part of their bodies survive after flowering and fruition, and repeat the growing and flowering cycle for a long time. Examples include fruits, tea plants and asparagus.

(Q8-10) Why does a reduction of the organic production period apply to “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?”

(A)

Because prohibited substances will not be used for no less than three years if organic production management is applied for no less than one year to the fields in which prohibited substances have not been applied for no less than two years.

(Q8-11) How are plant products handled if fields are affected by the drifting of agricultural chemicals applied to other fields?

(A)

Influences of drifting or flowing of agricultural chemicals into fields depend on the geographical conditions of the fields and weather conditions in the area. If fields for organic production are confirmed to have been affected by drifting or flowing of agricultural chemicals other than those listed on Table 2 of the JAS for Organic Plants, the products in the relevant fields are not organic plants.

(Regarding Article 4: Seeds or seedlings to be used in fields)

(Q9-1) What are “scion” and “stock”?

(A)

A scion is a bud to be grafted to a stock, while a stock is a plant with a root for grafting.

(Q9-2) What does “a part” mean in “full bodies or parts of the plant body?”

(A)

“A part” includes stems and seed tubers of aroids and sweet potatoes.

(Q9-3) What kind of seed-propagating plants and vegetative-propagating plants fall under criteria for seeds or seedlings to be used in organic fields? And what are the youngest available seedlings?

(A)

1. Seed propagating plants are plants that grow from seeds and do not include those that propagate from cuttings. Examples include grains such as rice and wheat, leafy vegetables such as spinach, tomatoes, and vegetable fruits other than strawberries.
2. Vegetative propagating plants are plants that do not grow from seeds, but grow from cuttings so as not to lose their essential characteristics. Examples include fruits, potatoes and tea.
3. The use of the youngest seedlings of vegetative propagating plants is permitted if organic seedlings or seedlings not treated with prohibited substances are not available. Such seedlings include the youngest scion for fruits and seed tuber for alimentary konjac. Seeds and seedlings should be from organic sources. If they are not available, the period under organic production should be lengthened as much as possible by procuring the youngest seedlings.

(Q9-4) What are edible sprouts?

(A)

1. Upon producing edible sprouts through organic cultivation, provisions for difficulties in obtaining organic seeds, seedlings as stipulated in criteria for “Seeds or seedlings to be used in fields” do not apply. As such, organic grading cannot be conducted without carrying out the production of edible sprouts using organic seeds, seedlings, etc.
2. Edible sprouts are plant products that grow only by the productivity of seeds or seedlings, not by the productivity of organic fields. Examples include sprouts of white radish, peas and beans derived from the productivity stored in seeds, and shoots of *Aralia elata* and tea derived from the productivity stored in nursery stock or scion. (Sprouts are labeled as organic if they are stored in organic fields during the planting season and harvested during the next season, but only when the original intention is to harvest them during the planting season.)

(Q9-5) What kind of seeds or seedlings can be used in fields?

(A)

1. In producing organic plants, the use of seeds or seedlings produced in accordance with criteria under Article 4 of the JAS for Organic Plants is the general rule. Seeds or seedlings produced outside of certified fields can also be used provided that they are confirmed to fulfill the same criteria.
2. In cases where it is difficult to obtain the seeds and seedlings in 1., or cases in which it is necessary to maintain and regenerate certain varieties, seeds and seedlings that do not contain prohibited substances may be used. In the case of seeds, those that do not contain prohibited substances refer to seeds that have not undergone disinfection or coating treatment using prohibited substances after being picked. In the case of seedlings, those that do not contain prohibited substances refer to seedlings for which prohibited substances are not used at the stage of raising seedlings.
3. In cases where it is simultaneously difficult to obtain the seeds and seedlings under both 1. and 2., conventional seeds may be used for seed-propagating varieties and the youngest available conventional seedlings may be used for vegetative-propagative varieties. This is in order to ensure that the period of non-organic control is kept to the utmost minimum even in cases where conventional seeds and seedlings are used without any other option.

Additionally, it is stipulated that “(those) without synthetic fertilisers and pesticides that are effective in fields after the sowing or planting” are to be used. In specific terms, this refers to seeds and seedlings that contain materials with adjusted elution volumes and periods for their fertilizer component through being covered with a coat of chemical fertilizer, etc. When seedlings containing such materials are planted, long-term chemical fertilizers remain in effect in the fields, thereby being incompatible with the production principle of organic plants. This is the basis for the limitation placed on the usage of such seeds and seedlings under the 2012 revision to standards. Note that standard seed disinfectant does not fall under agricultural chemicals that demonstrate sustained effects in fields after sowing or planting.

4. In cases where it is difficult to obtain seedlings under 3. and there are no seedlings, etc. to plant or no supply of seeds due to a disaster, pests, etc., conventional seedlings may be used for seed-propagating varieties and seedlings other than the youngest ones may be used for vegetative-propagating varieties. Conventional seedlings may also be used in cases of private seedling-raising when pests or other reasons inhibit the growth of the seedlings and if re-raising seedlings causes one to miss the proper time of cultivation. In such cases as well, the use of seedlings containing chemosynthesized fertilizers and agricultural chemicals that demonstrate sustained effects in fields after planting is not permitted.
5. With regards to fruit and vegetable crops consisting of Solanaceae plants and Cucurbitaceae plants, raising seedlings is difficult in certain cases. Therefore, for a

certain period of time, the use of general seedlings that do not contain chemosynthesized fertilizers or agricultural chemicals that demonstrate sustained effects in fields after planting is recognized as a transitional measure under the Supplementary Provisions. For arum root potatoes as well, given the difficulties present in organic cultivation from the seed tuber stage, cultivation from a non-seed-tuber stage is similarly recognized for a certain period of time.

(Q9-6) What is referred to by “case of a difficulty to obtain?”

(A)

1. “Case of a difficulty to obtain” include cases where the amount of organic seeds or seedlings intended for sale is extremely limited or the price of organic seeds or seedlings is extremely high.
2. Note that these are only recognized as exceptional measures. As a general rule, seeds or seedlings produced in accordance with Article 4 of the JAS for Organic Plants are to be used.

(Q9-7) What is referred to by “case of [...] necessity for maintenance and renewal of varieties?”

(A)

1. Repeated private seed production can cause yields to decrease and disparities in the attributes specific to certain varieties to become conspicuous. A method of preventing this is regularly purchasing and cultivating seeds, etc. of a specific variety. Such cases fall under “case of [...] necessity for maintenance and renewal of varieties.”
2. Note that these are only recognized as exceptional measures. As a general rule, seeds or seedlings produced in accordance with Article 4 of the JAS for Organic Plants are to be used.

(Q9-8) How should the conformance of seedlings sold as organic seedlings with Paragraph 1 of the criteria for seeds or seedlings used in fields be verified?

(A)

For seedlings available for purchase, information on the site used for raising seedlings and the materials used in the raising process is checked using documents. If the seedlings are found to full the criteria stated under Paragraph 1, they can be used.

(Q9-9) Why are materials for agricultural use that contain embedded seeds in tape form limited to those from cotton linters? Is the use of materials in sheet rather than tape form permissible?

(A)

With regards to materials for agricultural use that contain embedded seeds in tape form, there are three types of ingredients: poly-vinyl alcohol, cotton linters and pulp. Among those, only materials whose ingredients consist of recycled fibers derived from cotton linters to which chemosynthesized substances have not been added during the manufacturing process for said materials can be used. Moreover, the form of said materials is limited to those with a tape form containing the necessary width to contain the seeds. Materials in sheet form that act as mulches do not apply.

(Regarding Article 4: Manuring practice in fields)

(Q10-1) What does “the method utilizing biological functions” mean?

(A)

It means the improvement of soil through the decomposition of organic materials by organisms and the metabolism of organisms. Organisms in soils include earthworms, insects and microorganisms whose activities contribute to soil fertility.

(Q10-2) What cases falls under “cases where the productivity of fields derived from soil are not maintained or increased only by methods utilizing biological functions?”

(A)

Such cases include those where the product is not able to normally grow because of a lack of nutrients.

(Q10-3) For purposes of fertilization management, is it acceptable for culture media to which chemosynthesized substances have been added in the manufacturing process or culture media using genetically-modified organisms to be used upon introducing microorganisms from external sources or cultivating microorganisms for processing fertilizer and soil enhancement substances listed in Attached Table 1?

(A)

With regards to culture media for microorganisms, in cases where the good majority of said media remain in the final material product, it is necessary to refrain from using genetically-modified organisms and chemosynthesized substances. However, for substances in which the good majority of said media do not remain in the final material product, as is the case with the culture of fungus spawn, it is unnecessary to verify that genetically-modified organisms and chemosynthesized substances are not used in said media.

(Regarding Article 4: Fungus spawn, Cultivation sites and Cultivation management in cultivation sites)

(Q11-1) What kinds of cultivation methods are covered for mushrooms?

(A)

Organic mushrooms shall be grown in a place with soil (fields) in the same manner as other organic plants. Methods of mushroom cultivation can be roughly classified into three categories: wood log cultivation, compost cultivation, and fungal bed cultivation. In any case, mushrooms that are grown “on” or “within” the soil are covered by the standards. In addition to fields located in natural forests, etc., cultivation in facilities such as plastic greenhouses is also covered by the standards, provided that it takes place “on” or “within” soil in the facilities as well. Furthermore, the floor surface cannot be covered with artificial items. However, in cases where cultivation work has to be performed safely and efficiently, the installation of concrete, gravel, perforated metal (metal-based material processed with perforations in it), etc. to cover pathways for the purposes of conveyance, etc. is allowed. Additionally, farming in an air-conditioned semi-closed system is not regarded as a cultivation management method that maintains or improves the cycle of nature with the least possible impact on the environment, and such farming is therefore not covered by the standards. In the event that it is difficult to control appropriate levels of temperature and humidity through sprinkling, light exclusion, etc., it is permissible to warm the inside of the facility or ventilate it using an exhaust fan, etc. However, warming the facility should be achieved by the use of the likes of a waste fungal bed or wood cuttings and/or waste logs resulting from forest management. In compost cultivation, it is permissible to steam-sterilize compost made from rice straw before planting. Also, in fungal bed cultivation, it is permissible to steam-sterilize fungal beds before planting. The fungal beds are then buried in the soil or placed on the field for the standards to apply.

(Q11-2) What kind of fungi is it permissible to use?

(A)

Fungi as defined within the “Standards for the Manufacture and Management of Fungal Beds for Mushrooms” (4 *Rinyasan* No.38, Notification of the Forestry Agency) are fungal body or culture that are intended to be used as seeds for cultivating mushrooms and whose mycelia for said seeds have been cultivated in a pure manner within appropriate conditions. While inoculated fungal beds are also referred to as fungi on occasion, fungi as referred to under the JAS for Organic Plants do not include fungal beds. As a general rule, for materials used to cultivate fungi that are planted on bed logs, fungal beds, etc., materials produced in accordance with production methods for organic plants are to be used per the criteria under “Fungus spawn.”

(Q11-3) Sugar is included under the fungi cultivation materials in Attached Table 3. Can sugar whose refining process involves the use of food additives outside those in Attached Table 1 under the JAS for Organic Processed Foods also be used in cultivation?

(A)

The use of fungi cultivation materials in Attached Table 3 is allowed only in cases where it is difficult to obtain fungi or natural substances cultivated with the use of materials produced without the application of prohibited materials or fungi cultivated with the use of natural substances or materials derived from natural substances that have not been chemically treated. As such, the use of food additives other than those in Attached Table 1 under the JAS for Organic Processed Foods is viewed as something that cannot be avoided.

(Q11-4) What kind of soil is it permissible to use as earth soil for mushrooms in compost?

(A)

When bringing in soil from a location other than a cultivation site, in addition to being free of prohibited materials drifting or flowing in from the surrounding area for at least the last two years, said soil has to have been collected from certain zones where prohibited materials are not used, and must be kept free of the use of said materials after collection as well.

(Q11-5) What kind of materials can be used in the cultivation of mushrooms in compost?

(A)

Fertilizers and soil improvement substances in Attached Table 1 can be used only in cases where it is difficult to plan for sufficient cultivation and generation only with materials of wood origin and materials produced in accordance with organic production methods. Within Attached Table 1, items assumed to be used in the cultivation of mushrooms in compost consist of materials derived from plants or plant residue, materials derived from fermented, dried or baked excretion, calcium oxide(including unslaked lime), calcium hydroxide(slaked lime), calcium carbonate and trace elements(manganese, boron, iron, copper, zinc, molybdenum and chlorine).

(Q11-6) Paragraph 2 of the criteria for cultivation management in cultivation sites in the Table under Article 4 provides that materials of non-wood origin shall be only from those listed thereunder. Is it prohibited to use materials derived from plants, processed foods and feeds unless they are labeled with Organic JAS logos (rating)?

(A)

It is permissible to use by-products of graded organic plants (e.g., straw and bran from organic rice) produced in compliance with production standards such as the JAS for Organic Plants. They do not have to carry Organic JAS logos but must be confirmed to be from organic sources before use.

(Q11-7) What is meant by “case of difficulty obtaining those (substances for producing fungi complying with the criteria prescribed in 1 to 3)” prescribed as criteria for cultivation management in cultivation sites in the Table under Article 4?

(A)

These are cases where available amounts of materials for growing mushrooms in compost are insufficient because there is no or extremely limited production of the organic plants concerned.

(Q11-8) Is it permissible to use styrene plugs as fungal plugs following inoculation when cultivating wood logs for mushrooms?

(A)

Sealing wax and styrene plugs that have been chemically treated cannot be used. However, the use of sealing wax derived from plants is permitted. Moreover, in cases where organic mushroom cultivation is conducted in a plantation where styrene plugs were previously used, it is necessary to ensure that the plantation is completely clear of the previously-used styrene plugs.

(Regarding Article 4: Control of noxious animals and plants in fields or cultivation sites)

(Q12-1) What are cultural, physical and biological methods to control noxious animals and plants?

(A)

- (1) The cultural method is a way of controlling by changing the crop cultivation methods. Examples of this method include: a) cultivation of resistant varieties; b) utilization of resistant stocks; c) utilization of sound seeds and seedlings; d) mixed planting, crop rotation and paddy-upland rotation; e) irrigation; f) plowing and intertillage; g) utilization of cover plants; and h) adjustment of cropping seasons.

- (2) The physical method is a way of physical control using gravity, light, heat, sound and so forth. Examples of this method include: a) selection of seeds by specific gravity; b) interception of light; c) utilization of light traps and light repelling worms; d) utilization of plastic tapes; e) disinfection of seeds using hot water; f) disinfection of soil using solar heat or steam; g) utilization of sounds such as explosive sounds; h) utilization of electricity; and i) utilization of net.
- (3) The biological method is a way of controlling through interactions between organisms. Examples of this method include; a) utilization of antagonistic microorganisms; b) utilization of natural predatory and parasitic enemies; and c) utilization of small animals.

(Q12-2) What does “selection of species and varieties” mean?

(A)

“Selection of species and varieties” includes selecting those which are suitable for the soil and the weather in the region, resistant to noxious animals and plants, and appropriate for rotation, mixed planting and paddy-upland rotation. Rotation, mixed planting and paddy-upland rotation are performed to prevent soil fertility from lowering and to suppress the emergence of noxious animals and plants.

(Q12-3) What does “adjustment of the cropping season” mean?

(A)

It means to shift the cropping season for the purpose of avoiding periods in which noxious animals and plants are most active, thereby minimizing the damage they cause.

(Q12-4) Is weed suppression in paddy fields through applying rice bran, broken soybeans, soy pulp, etc. allowed?

(A)

Applying rice bran, broken soybeans, soy pulp, etc. to paddy fields causes light to be excluded from the soil surface and the soil to become oxygen-deficient due to microorganisms. As a result, suppressing the budding and growth of weeds is allowed as a method that combines both physical and biological control. However, if chemosynthesized food additives were used during the manufacturing process of the soy pulp, etc. in question, said soy pulp, etc. cannot be directly applied to fields due to falling under prohibited substances.

(Q12-5) Is the application of noxious animals and plants weakened using agricultural chemicals under Attached Table 2 to fields allowed for the purpose of introducing predatory animals and parasitic microorganisms?

(A)

Such methods of application are not allowed due to falling outside the scope of the applicable usage of agricultural chemicals.

(Q12-6) What are cases of imminent or serious threats to crops?

(A)

Cases where noxious animals and plants exist or are highly likely to emerge in the surrounding fields or in organic fields based on the previous experience, and products are likely to be seriously damaged.

(Q12-7) What kinds of mulches are permissible to use?

(A)

Paper mulch can be used provided that chemical substances (excluding corn starch used for dispersing activated carbon) have not been added during the process of processing waste paper, the ingredients for said mulch, into the final agricultural material product. Plastic mulch (including that coated with corn starch to prevent adhesion) may be used provided that it is removed from the field following use. Biodegradable mulch, on top of having chemical substances added to it during the manufacturing process, cannot be removed from fields following use. As such, its use is not permitted.

(Regarding Article 4: General management and Management of raising seedlings)

(Q13-1) Why were the requirements on the general management and management of raising seedlings introduced in standards for production methods with the 2005 revision?

(A)

1. Prior to this revision, in addition to fertilizers and agricultural chemicals in production management before harvest, materials to which chemosynthesized substances are added and are likely to contaminate organic plants or fields by being applied to or brought into contact with plants or soils, had been prohibited as a matter of policy. This revision clarified this issue as “general management” to thoroughly notify concerned parties such as certified production process managers.
2. “Management of raising seedlings” was set forth to clarify the criteria of raising organic seedlings in locations other than organic fields, such as in nursery boxes and nursery pots.

(Q13-2) Can the agricultural chemicals listed in Attached Table 2 be used for seed sterilization?

(A)

Criteria for general management are applied to planting sterilized seeds in soil. As the criteria stipulates that “plants, soil and fungi shall not be put in any prohibited substances,” only permitted substances, namely the agricultural chemicals listed in Attached Table 2, can be used for seed sterilization.

(Q13-3) Is the use of salt water permitted for selecting seeds by specific gravity?

(A)

The use of salt water is permitted for selecting seeds by specific gravity if natural salt or salt without chemical treatment is used as provided in “general management.” “General management” includes the specific gravity selection of seeds.

(Q13-4) Can seawater be applied to fields?

(A)

As the criteria of general management are applied to sprinkling seawater over the field, seawater can be used if it conforms to the criteria (i.e., untreated seawater or seawater without the use of chemical treatment).

(Q13-5) Do fields include places for raising seedlings, such as nursery boxes or nursery beds?

(A)

Fields do not include facilities for raising seedling such as nursery boxes, pots or beds. If seedlings are raised in such facilities, they shall be managed under the production process that complies with the criteria of “raising seedlings” in the Organic JAS.

(Q13-6) When raising seedlings using soil from a field that has begun the process of conversion to an organic field and planting the seedlings in the field from which the soil was collected, can said soil be considered to be in conformance with Paragraph 1 of the criteria under Management of Raising Seedlings?

(A)

When seedlings that have been raised using soil from a field that has begun the process of conversion to an organic field have been planted in the field from which the soil was collected, it is considered to be the same as if seeds were directly planted in said field. As such, the soil in question can be considered to be in conformance with Paragraph 1 of the criteria under Management of Raising Seedlings.

(Regarding Article 4: Management concerning transportation, selection, processing, cleaning, storage, packaging and other post-harvest processes)

(Q14-1) Do the criteria for “management concerning harvest, transportation, selection, processing, cleaning, storage, packaging and other post-harvest processes” apply until consumers receive the products?

(A)

The criteria apply from the harvest to shipment by certified operators of organic plants. Products shall be well managed after the shipment up to possession by consumers so that they are not mixed with conventional products or contaminated by prohibited substances. Article 19-12 of the JAS Law and Article 72 of the Ministerial Ordinance stipulated that Organic JAS logos shall be always removed or deleted if organic products are mixed with conventional products.

(Q14-2) What kinds of materials are used for cleaning machines and tools in the processes of “management concerning transportation, selection, processing, cleaning, storage, packaging and other post-harvest processes?”

(A)

The Organic JAS does not specifically set forth substances for cleaning machines and tools. Thoroughly rinsing substances with water is required so as not to contaminate organic plants.

(Q14-3) The JAS for Organic Processed Foods stipulate that the use of chemicals other than those in Attached Table 2 to control noxious animals and plants during phases outside of manufacturing and storage of organic processed foods is permissible. In a similar fashion, is it also permissible to use chemicals other than those in Attached Table 4 at facilities where the processing, etc. of organic plants is conducted?

(A)

In cases such as those when the usage duration of facilities used for processing is limited, the use of chemicals other than those in Attached Table 4 is permitted provided that they are used during periods when the facilities in question are not being used for the processing, storage, etc. of organic plants. However, prior to the use of those facilities for the processing, etc. of organic plants, the chemicals used must be removed.

(Q14-4) It is stipulated that upon using agricultural chemicals under Attached Table 2 and chemicals under Attached Table 4 for the purpose of controlling noxious animals and plants in processes such as harvest, transportation, selection, processing, cleaning, storage, packaging and other post-harvest processes, the mixing of said chemicals with plants must be prevented. Doesn't the use of carbon dioxide fumigants and metaldehyde (granular formulation) result in mixing with plants?

(A)

Given that carbon dioxide fumigants are used to suffocate pests, said use constitutes temporary contact and is not regarded as mixing as such. Additionally, while the use of diatom earth (granular formulation) by directly mixing it intimately with grain, etc. is not allowed due to this constituting a mixture, there is no issue with the use of this chemical to coat, etc. the facility, as this does not constitute a mixture.

(Q14-5) What is quality preservation and improvement?

(A)

Quality preservation is maintaining a certain level of quality and preventing the quality deterioration, such as preserving freshness by nitrogen and carbon dioxide. Quality improvement involves, as an example, the use of ethanol (including alcohol) to remove the astringency of persimmons.

(Q14-6) Although ionizing radiation is prohibited, can radiation be used for process management purposes?

(A)

The use of ionizing radiation for purposes of controlling noxious animals and plants and storing or sanitizing foods is not permitted. However, ionizing radiation may be conducted for the purposes of shape verification or foreign object inspections, which fall under process management. Note that even in cases of the latter, the dose of radiation absorbed by food and drink products must be no more than 0.10 Gy. Additionally, there is no issue with X-ray inspections conducted upon customs clearance for imported foods.

(Q14-7) For the purpose of protecting workers from insect bites, etc., is it permissible to use insect repellent in fields and work areas?

(A)

Insect repellent and other quasi-drugs for control use that are applied to protect the health of people may be used after taking maximum precautions to prevent the mixing of said quasi-drugs with plants. A way of handling this is to use said quasi-drugs prior to entering fields or work areas.

(Q14-8) It is my understanding that plant quarantine measures will be conducted for wood packing materials for imported goods. How will organic plants be handled under these measures?

(A)

These quarantine measures are based on the premise of decontamination treatment being conducted in the exporting country. Wood packing materials for imported goods labeled as having undergone decontamination treatment in accordance with international standards are therefore not subject to quarantine measures for plants. As such, upon exporting organic plants, etc., it is permissible to use wood packing materials labeled as having been treated (pallets, crates, wooden frames, etc.) to distribute organic plants, etc. whose organic properties are definitely secured while taking appropriate measures to prevent direct contact with said organic plants, etc. and so forth. Additionally, it is appropriate to avoid the use of wood packing materials not labeled as having been treated due to the likelihood of chemical based-contamination detected upon the import inspection process. Moreover, should the organic plants, etc. and wood packing materials come into direct contact with each other, causing chemicals, etc. to mix in, it is naturally necessary to remove or invalidate the grading label in accordance with the provisions under Article 19-12 of the JAS Act.

(Q14-9) Do organic plants contain absolutely no residual chemical substances?

(A)

Organic agriculture is based on minimizing the use of external inputs, avoiding the use of synthetic fertilizers and pesticides. Organic agriculture practices cannot ensure that products are completely free of residues, due to general environmental pollution. However, methods are used to minimize pollution of air, soil and water with cultivation management methods so as to reduce the load from agricultural production on the environment as much as possible, such as making judgments on materials whose use is unavoidable in accordance with *the Codex Guidelines*.

(Regarding Attached Table 1)

(Q15-1) What criteria are items listed in Attached Table 1 based on?

(A)

Fertilizers and soil improvement substances in Attached Table 1 have been compiled based on usable items indicated explicitly by *the Codex Guidelines*.

(Q15-2) How is it determined whether a certain substance can be used or not?

(A)

It is judged on a case-by-case basis due to the fact that the production method of materials varies depending on the availability of ingredients and the prevalence of technologies. Specific consideration shall be given according to the following criteria:

- a) Whether the substance is listed in Attached Table 1;
- b) Whether the substance is treated with any chemosynthesized substances through the production process; and
- c) Whether the criteria for the use of the substance has been met.

(Q15-3) What are the criteria for permitted substances only in unavoidable cases for organic plants production?

(A)

1. Attached Tables set forth permitted substances only in unavoidable cases for organic plants production. Sources of the substances are set forth in the Attached Tables as well.
2. Article 10 of the Government Ordinance prohibits the use of chemosynthesized agricultural chemicals, fertilizer and soil improvement substances, except for those set forth by the Minister of Agriculture, Forestry and Fisheries in Notification No. 1005 of the Ministry of Agriculture, Forestry and Fisheries, July 14, 2000. For example, petroleum oil emulsifiable concentrates, which are not listed in this Notification, cannot be used as long as their active ingredients are chemosynthesized.
3. When the materials listed in the Attached Tables of the Organic JAS are formulated and otherwise processed prior to use, fertilizer, soil improvement substances and processing materials are limited to “those without chemically-synthesized substances added in processing and produced without recombinant DNA technology in raw materials” under Article 4 of the Organic JAS.

(Reference) The public notice on chemosynthesized agricultural chemicals, fertilizers and soil improvement substances to be specified by the Minister of Agriculture, Forestry and Fisheries pursuant to the provision of Article 10, Paragraph 1 of the Order for Enforcement of the JAS Law (Notification No. 1005 of the Ministry of Agriculture, Forestry and Fisheries, 2000). Agricultural chemicals, fertilizers and soil improvement substances whose active ingredients are the synthetic chemicals listed below.

1. Agricultural chemicals

Sulfur smoking agent, sulfur powdered agent, sulfur/copper wettable powder, reduced starch saccharification solution, vinegar, wettable sulfur powder, calcium oxide, sex pheromone agent, lime sulfur powder, potassium hydrogen carbonate

water soluble powder, sodium hydrogen carbonate water soluble powder and sodium bicarbonate, sodium hydrogen carbonate/copper wettable powder, spreader, biopesticide formulation / copper wettable powder, copper wettable powder, copper powdered agent, carbon dioxide fumigant, metaldehyde (granular formulation), copper sulfate, ferric phosphate (granular formulation) and wax wettable powder

2. Fertilizers and soil improvement substances

Sulfur, calcium chloride, calcium hydroxide (slaked lime), fertilizer for providing trace elements, aluminum calcium phosphate, vinegar and lignin sulfonate

(Q15-4) Is the use of composts derived from genetically modified crops permitted?

(A)

The 2006 revision clearly states that “fertilizers shall be limited to those whose ingredients are not produced by recombinant DNA technology,” and this shall also apply to composts. At present, however, it is difficult in practice to confirm that any of the following is not derived from genetically-modified crops: materials derived from plants and plant residues; materials derived from fermented, dried or baked excrement; by-products of food and textile industries of plant, livestock or fish origin; and materials derived from fermented leftover food. Given that this can hinder the utilization of these materials, the use of materials non-compliant with this provision shall be permitted for a certain period as set forth in the Supplementary Provisions.

(Q15-5) In the 2005 revision, usage criteria for organic by-products of food production industries, etc. permitted for fertilizers and soil improvement substances in Attached Table 1 were revised. Does this mean that some of the organic by-products of food production industries that were previously permitted have become prohibited?

(A)

The 2005 revision stipulates that the by-products of food and textile industries of plant, livestock or fish origin used for fertilizers and soil improvement substances shall be free of chemical treatment for preservation purposes except for the extraction of oil with organic solvents. Therefore, organic by-products of food production industries that are treated with chemicals or food additives within the range permitted for foods are no longer covered by the revised standards. However, organic by-products of food production industries that are fermented without the use of other substances can be used due to falling under the category of materials derived from fermented leftover food.

(Q15-6) In the 2005 revision, the revised Attached Table 1 of the JAS for Organic Plant Products does not contain substances from fish meal powder to steamed bone meal. Is the use of those substances permitted for the production of organic plants?

(A)

The substances mentioned are categorized into “by-products of food and textile industries of plant, animal and fish origin” and “Processed animal products from slaughterhouses or fish industries” in the revised Attached Table 1 of the JAS for Organic Plants. The use of the mentioned substances is permitted, if they satisfy the criteria of “manuring practice in fields” in Article 4 of the Organic JAS and they are “those derived from natural sources, or natural sources without the use of chemical treatment” as set forth in the criteria for said substances under Attached Table 1.

(Q15-7) “Those derived from natural sources, or natural sources without the use of chemical treatment” are stipulated under criteria for vegetation ash. For substances used in plants and wood at the production stage, is it necessary to confirm these criteria?

(A)

There is no need to confirm said criteria for substances used in plants and wood at the production stage. The use of said substances is allowed provided that they have not undergone chemical treatment after the plants have been reaped or deforested. Moreover, the same also applies to bark compost and charcoal.

(Q15-8) When using ion exchange membranes in refining processes for potassium chloride and sodium chloride, is it permissible to use hydrochloric acid, etc. for the purpose of protecting the ion exchange membranes from precipitation?

(A)

Potassium chloride and sodium chloride are assumed to be produced by non-chemical methods. The use of ion exchange membranes is treated as constituting physical methods. As a processing aid added to protect ion exchange membranes from precipitation, hydrochloric acid, etc. is believed to be indispensable in refining processes using ion exchange membranes. As such, the use of hydrochloric acid, etc. is allowed.

(Q15-9) “Shell fossil fertilizers” were removed from the list of permitted materials in Attached Table 1. Can they no longer be used?

(A)

In the 2006 revision, the names of fertilizers listed in Attached Table 1 were provided in a standard manner regardless of the names used in the Fertilizer Control Law.

“Calcium carbonate fertilizers” was changed to “calcium carbonate.” “Shell fossil fertilizers” are permitted to be used since their main ingredient is calcium carbonate. “Coral fossils” can also be used.

(Q15-10) What are “trace elements?” Is the use of synthetic trace elements permitted as well?

(A)

Trace elements include manganese, boron, iron, copper, zinc, molybdenum and chlorine and the criterion is “those without chemosynthesized substances other than trace elements themselves.” The use of synthetic trace elements such as “manganese sulfate” and “zinc sulfate” is permitted.

(Q15-11) In the criteria for stone meal, what is meant by the phrase “not contaminating the soil with harmful heavy metals or other harmful substances included in sources?”

(A)

It means keeping the soil of the fields away from being contaminated with harmful heavy metals such as cadmium, lead, hexavalent chrome, arsenic, total mercury, alkyl mercury and copper, and with other harmful substances such as radioactive substances and asbestos, thus preventing any impact on the environment. These substances shall be controlled in accordance with 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.

(Q15-12) “By-products of sugar industries” are listed in Attached Table 1. What do these by-products refer to? Also, sugar production generally involves a chemical treatment process. The by-products resulting from such manufacturing processes cannot be used, correct?

(A)

By-products of sugar industries refer to the likes of molasses, sugar, blackstrap molasses, bagasse and milk of calcium. The use of by-products of sugar industries is in conformity with *the Codex Guidelines*. It is permissible either to employ or not employ chemical treatment in the sugar production process. However, the use of by-products of sugar industries that are treated with chemical substances is prohibited. Molasses produced by non-sugar industries can be used if it complies with the criteria on by-products of food and textile industries of plant, animal and fish origin.

(Q15-13)What kinds of substances are included in “other fertilizers and soil improvement substances”?

(A)

1. Soil fertility shall be maintained or increased only by composts derived from by-products from the mentioned fields, or by methods effectively utilizing biological functions of organisms in the fields or in the surrounding areas as set forth in “manuring practices in fields.” The use of fertilizers and soil improvement substances listed in Attached Table 1 is permitted, but only in cases where the measures identified as above are not effective.
2. The use of “other fertilizers and soil improvement substances” is permitted, but only in cases where the use of other substances listed in Attached Table 1 is not effective enough for maintaining or increasing soil fertility.
3. The use of substances categorized under “other fertilizers and soil improvement substances” should not be permitted if they are substituted with the other substances listed in Attached Table 1.
4. The use of substances that fall under specific control substances under the Agricultural Chemicals Control Act and appear to have pest control effects is also prohibited.

(Q15-14)What are the criteria for evaluating whether or not substances fall under “substances which may be used only in cases where the listed substances in Attached Table 1 are not effective for maintaining or increasing soil fertility” in Attached Table 1 of the JAS for Organic Plants?

(A)

1. The substances in question shall satisfy “manuring practice in fields” in Article 4 of JAS for organic plants and the criteria contained in Attached Table 1 below:
 - a) The use is essential for the intended objective and is not substituted with other substances listed in Attached Table 1 in quality or quantity;
 - b) Natural substances or derived natural substances without the use of chemical treatment (those produced by burning, calcining, melting, dry distilling, and saponifying natural substances and those produced from natural substances without any chemical treatment);
 - c) Those manufactured without recombinant DNA technology; and
 - d) Those that objectively have no effects for pest and disease control. (i.e. those whose medicinal effects are not recognized by the Subcommittee for Specific Agricultural Chemicals, the Agricultural Chemical Section of the Council for Agricultural Materials.)
2. The substances satisfying the criteria mentioned in 1 above shall also comply with the following criteria:

- a) Its use neither causes nor contributes to a negative impact on the environment and the ecosystem through the process of manufacture, use and disposal;
- b) Its negative impact on health and the quality of life of human or other animals is minimum; and
- c) Its use does not negatively impact on the soil system balance, the soil's physical properties and the quality of water and air.

(Q15-15) Among “other fertilizers and soil improvement substances,” “those produced by burning, calcining, melting, dry distillating, and saponifying the natural resources and those produced from natural resources without using any chemical methods and recombinant DNA technology” are set forth as “(those) derived from [...] natural sources without the use of chemical treatment.” Does a similar approach apply to “those derived from natural sources without any chemical treatment” under criteria for other materials in Attached Table 1? Also, is the use of pyroligneous acid allowed?

(A)

“Other fertilizers and soil improvement substances” are approached in a similar fashion with materials stipulated as “those derived from natural sources without any chemical treatment” among other materials in Attached Table 1. With regards to materials stipulated under criteria for “those derived from natural sources without any chemical treatment,” the use of those materials that have been manufactured through burning, calcining, melting, dry distillating or saponifying is allowed. Additionally, the acceptability of the use of pyroligneous acid, soap, etc. is also respectively determined based on criteria set forth for other fertilizers and soil improvement substances.

(Q15-16) Is the use of sewage sludge permitted for the production of organic plants?

(A)

The use of sewage sludge in organic production is believed to be limited to exceptional cases due to the need for the certified production process manager who uses the sewage sludge to manage and control its origin and discharge process for all operators, etc. that discharge sewage sludge as well as justify that all sewage sludge represents natural substances or is derived from natural substances.

(Q15-17) Is the use of human excrement permitted as an ingredient for fertilizer?

(A)

The use of human excrement is prohibited due to Attached Table 1 limiting “materials derived from fermented, dried or baked excrements” to that derived from livestock and poultry. However, with regards to the “methane-fermented digestive liquid” added with the 2012 revision, provided that this substance fulfills criteria under Attached Table 1,

it may be used even if its ingredient is human excrement.

(Regarding Attached Table 2)

(Q16-1) What is the basis for selecting the substances listed in Attached Table 2?

(A)

The substances used for pest control listed in Attached Table 2 are selected from those registered under the Japanese Agricultural Chemicals Control Law among those listed in *the Codex Guidelines*.

(Q16-2) What substances fall under “biopesticide formulation” in Attached Table 2 of the JAS for Organic Plants?

(A)

Table 2, Annex 2 of *the Codex Guidelines* provides that “microorganisms used for biological pest control” are microorganisms (bacteria, virus and fungi) such as *Bacillus thuringiensis*, the Granulosis virus, etc. Agricultural chemicals that are refined and concentrated from products by microorganisms include antibiotics which *the Codex Guidelines* do not permit. “Biopesticide formulation” is only that derived from natural enemies and organisms, irrespective of being dead or alive, and does not include that refined and concentrated from products by microorganisms. Examples of “biopesticide formulation”: as of the end of February 2013 include

- *Bacillus thuringiensis* (wetable powder or granular formulation) (irrespective of being dead or alive);
- *Agrobacterium radiobacter* strain 84 agent;
- *Franklinothrips 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;
- *Sternernema 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;

(Q16-3) What kinds of substances fall under “biopesticide formulation/ copper wettable powder” in Attached Table 2 of the JAS for Organic Plants?

(A)

The use of biopesticide formulation and copper wettable powder when mixed and used by producers is allowed. This latest revision has mixtures of both agricultural chemicals (items mixed in advance and registered as agricultural chemicals) added to Attached Table 2. As a specific example, “copper bacillus subtilus wettable powder” falls under such mixtures.

(Related to Attached Table 4)

(Q17-1) How should the control of pests and small animals inside storage warehouses for organic plants be conducted?

(A)

The control of pests and small animals inside storage warehouses, etc. should be conducted by physical barricades, sound waves, supersonic waves, light, ultraviolet rays, traps, temperature control and other physical methods. Should these methods prove to be insufficiently effective, agricultural chemicals listed in Attached Table 2 or chemicals listed in Attached Table 4 may be used; however, use is limited to only these chemicals. Prior to use of agricultural chemicals listed in Attached Table 2, it is necessary to confirm based on their instructions for use whether or not said chemicals can be applied inside the warehouse, etc. Additionally, as the chemicals in Attached Table 4 are not agricultural chemicals, said chemicals are not to be used in an agricultural chemical-type manner that involves controlling pests for plants. As such, said materials are to be used for the purpose of controlling, attracting, repelling, etc. sanitary or unpleasant pests. Moreover, capsaicin in Attached Table 4 is to be used to prevent rodents from chewing on cords.

(Q17-2) The following is stipulated under chemicals in Attached Table 4: “Except for the purpose of pests control for plants.” What kind of meaning does this carry?

(A)

Chemicals stated in Attached Table 4 that are not registered as agricultural chemicals cannot be used as agricultural chemicals. To ensure that chemicals that are not agricultural chemicals are not used as such, the statement “Except for the purpose of pests control for plants.” is included.

(Reference: Excerpt from Agricultural Chemicals Regulation Law)

Article 1-2 (Definitions)

For the purpose of this law, the term “Agricultural chemicals” shall mean fungicides, insecticides, and other substances (including materials, specified by government ordinances, that use such substances as its ingredients or raw materials and are used to control the diseases and insects pests) used to control fungi, nematodes, mites, insects, and rodents or other plants and animals, or viruses (hereinafter generically called “diseases and insect pests”) that may damage crops (including trees and agricultural and forestry products, and hereinafter called “Crops, etc.”), and also refers to agents such as growth accelerators and germination suppressors, etc. used to promote or suppress the physiological functions of crops, etc.

(Q17-3) What kind of attractants or repellents for noxious animals and plants can be used in harvest and post-harvest processes?

(A)

In addition to chemicals listed in Attached Table 4, items whose ingredients are foods and food additives can be used.

(Regarding Attached Table 5)

(Q18-1) Why do criteria for hypochlorous acid water limit brine only to that which has been electrolyzed?

(A)

There are two types of hypochlorous acid water: strong acidic hypochlorous water, which is obtained by electrolyzing brine, and weak acidic hypochlorous water, which is obtained by electrolyzing hydrochloric acid. For hypochlorous acid water to be used as materials for the processing, etc. of organic plants, as materials derived from natural substances is preferable, usable hypochlorous acid water is limited to that which is obtained by electrolyzing brine.

(Regarding Supplementary Provisions)

(Q19-1) Is it permissible to use materials to adjust the viscosity of soil for raising seedlings?

(A)

In onion cultivation, when conducting the raising of seedlings during the winter season, root swelling within cells for raising seedlings is insufficient due to the low temperature. Consequently, it is necessary to give the soil a certain viscosity for raising seedlings. Currently, natural substances or materials derived from natural substances are being developed for use as viscosity-adjusting substances. However, further testing is necessary in order to put these into practical use. As such, in onion cultivation, the use of polyvinyl alcohols, polyacrylamides and chemically-treated substances derived from natural sources as viscosity-adjusting substances is allowed for a certain time, notwithstanding the provisions in the criteria on management of raising seedlings under Article 4 of the JAS for Organic Plants. Note, however, that this is only applicable in exceptional circumstances.

2. Japanese Agriculture Standards for Organic Processed Foods

(Regarding Article 2)

(Q20-1) Why are processing methods limited to that apply physical or biological functions?

(A)

Processing methods that apply physical or biological functions are appropriate for keeping the properties of organic foods and ingredients in manufacturing and processing. *The Codex Guidelines* bear the same principle as the Organic JAS.

(Q20-2) What exactly are processing methods that apply physical and biological functions?

(A)

Physical methods include mechanical methods such as comminution, mixing, molding, heating, cooling, compression, decompression, desiccation and isolation (filtration, centrifugation, compression, distillation, etc.). Processing methods that apply biological functions include fermentation utilizing fungi, yeast and bacteria. Fungi, yeast and bacteria in this case are not considered as ingredients. Please refer to (Q21-15) regarding whether or not to count the ingredients used in the cultivation of these microorganisms when calculating constitution ratios for ingredients.

(Regarding Articles 3 and 4)

(Q21-1) What revisions were made to the definition of organic processed foods in the 2006 revision?

(A)

The 2006 revision clearly defined food additives (the use of only those listed in Attached Table 1 is permitted) as non-organic ingredients in the definition of organic processed foods. The allowable percentage of non-organic ingredients (non-organic plants, non-organic livestock products, non-organic fishery products, and processed foods made of these products and food additives (excluding processing aids)) in the total ingredients contained in an organic processed food was defined as no more than 5 percent by weight.

(Before revision)

Organic processed foods			
Organic ingredients	Non-organic ingredients	Food additives	Water and salt
A	B	C	D
$B / (A + B + C) \times 100 \leq 5\%$ * D (water and salt) is excluded.			

(Current)

Organic processed foods			
Organic ingredients	Non-organic ingredients	Food additives	Water and salt
A	B	C	D
$(B + C) / (A + B + C) \times 100 \leq 5\%$ * D (water and salt) is excluded.			

(Q21-2) How do you meet the requirements for organic production when mixing ingredients?

(A)

When manufacturing organic processed foods, it is necessary for the final products to i) fit the definition of organic processed foods and ii) contain no less than 95 percent by weight of organic ingredients such as organic plants, organic processed foods and organic livestock products. When an organic processed food is used as an ingredient, it is necessary to obtain the mixing ratio of organic ingredients (organic plants and/or organic livestock products) of the organic processed food to calculate the percentage of organic ingredients constituting the final product. If accurate mixing ratios are difficult to obtain, it is necessary to calculate based on the assumption that the ratios are 95 percent by weight and fit the definition of organic processed foods.

(Q21-3) In the 2012 revision, a provision was added concerning the usage of non-organic agricultural and livestock products, etc. that limits said use to cases in which it is difficult to obtain organic plants, organic livestock products or organic processed foods that are identical in type to the ingredients being used. What is the reason for this addition?

(A)

The Codex Guidelines permit the use of non-organic ingredients up to 5% of total ingredients. However, this is limited to cases where it is difficult to obtain organic ingredients or secure sufficient quantities of said ingredients. As such, the above provision was added to JAS as well to reflect a similar approach. “Cases where it is difficult to obtain” include instances in which sales quantities of organic materials are extremely limited, as well as instances in which prices of said ingredients are significantly high. However, when product specifications deem it necessary to use ingredients of a designated production site or certain variety, should it be difficult to secure organic ingredients of the production site or variety in question, non-organic ingredients may be used. Take, for example, an ingredient that is to constitute no more than 5% of a product for which it is preferable to use domestically-produced ingredients to the highest extent possible. In cases where foreign-produced organic ingredients are readily available but domestically-produced ones are difficult to obtain, domestically-produced non-organic ingredients may be used.

(Q21-4) Is it permissible to use organic processed alcoholic beverages as organic ingredients in an organic processed food?

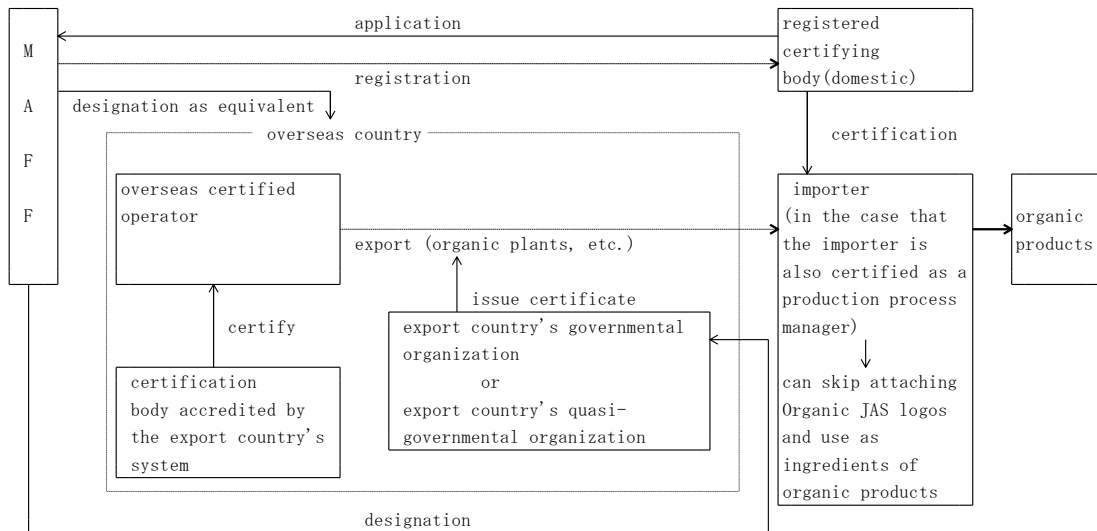
(A)

1. Organic processed alcoholic beverages can be counted as organic ingredients of an organic processed food only if the ingredients and production processes comply with the JAS for organic processed foods whereas they are outside of the scope of the JAS Law.
2. For example, an organic JAS-certified operator who grades organic sake lees can use its by-product (an organically processed alcoholic beverage) as an ingredient to produce an organic processed food.

(Q21-5) I understand that ingredients are limited to those labeled with Organic JAS logos. But what is the policy on organic plants 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 logos? Is it permissible for a Japanese manufacturer to use them as ingredients by obtaining a relevant certificate?

(A)

Organic agricultural products (limited to organic plants and organic processed foods of plant origin) that have been graded using a grading system of a country recognized to have a grading system equivalent to the Organic JAS system must be labeled with Organic JAS logos by a certified importer based on a certificate issued by the government of that country if they are intended to be distributed or sold as organic in Japan. Where such organic plants or organic processed foods are intended to be used as ingredients in an organic processed food, they must be labeled with Organic JAS logos. However, if the Organic JAS-certified Japanese manufacturer is also certified as an Organic JAS-certified importer, that manufacturer can confirm that the imported agricultural products from the country having the equivalent grading system comply with the standards equivalent to the Organic JAS standards based on the certificates issued by the government of that country or management records. They can therefore produce organic foods by using such imported products without attaching Organic JAS logos prior to their use.



MAFF: Ministry of Agriculture, Forestry & Fisheries

(Q21-6) Why are criteria for ingredients applied to processing aids?

(A)

Because permitted processing aids should be specified to comply with the principle of maintaining the integrity of organic foods and ingredients, taking into account that processing aids may cause chemical changes to foods.

(Q21-7) Do “ingredients” under Article 4 of the JAS for Organic Processed Foods require grading twice?

(A)

Manufacturers should be certified under the provisions of Article 14 of the JAS Law, and grade organic plants as ingredients and organic processed foods as final products, when they use plant products grown by themselves. Please note that attaching grading labels to organic plants as ingredients is not necessary.

(Q21-8) How are “the same categories of plant and livestock products with organic plants and organic livestock products” and “the same categories of processed foods with organic processed foods” in “ingredients” under Article 4 identified?
Examples: “*kurome daizu*” (dark hilum soybeans) and “*shirome daizu*” (white hilum soybeans), green soybeans and soybeans, nonglutinous rice and glutinous rice, tomato ketchup and tomato puree, green tea of middle grade and powdered green tea, “*koikuchi shoyu*” (dark soy sauce) and “*usukuchi shoyu*” (light soy sauce))

(A)

Decisions should be made on a case-by-case basis, but foods having generic names in common are identified as in the same categories. While “*kurome daizu*” (dark hilum soybeans) and “*shirome daizu*” (white hilum soybeans) cited as examples are plant products of the same crops, green soybeans and soybeans, nonglutinous rice and glutinous rice are not plant products of the same crops. Tomato ketchup and tomato puree, green tea of middle grade and powdered green tea, “*koikuchi shoyu*” (dark soy sauce) and “*usukuchi shoyu*” (light soy sauce) are not the same kind of processed foods.

(Q21-9) What exactly are “those derived from the recombinant DNA technology?”

(A)

Foods and food ingredients derived from recombinant DNA technology. These do not include milk products and meats made from domestic animals that were fed with plant products derived from recombinant DNA technology.

(Q21-10)How does one confirm whether or not foods underwent ionizing radiation?

(A)

The use of ionizing radiation is permitted only for potatoes for preventing germinations in Japan. Ionizing radiated foods should be labeled as such based on labeling guidance under the Food Sanitation Law.

(Q21-11)Is the use of food additives other than those listed in Attached Table 1 permitted in non-organic plants, livestock, marine products and processed foods made from them?

(A)

The use of food additives other than those listed in Attached Table 1 is permitted for non-organic plants, livestock, marine products and processed foods as ingredients of organic processed foods. 2. Please note that the use of ingredients containing those additives is not permitted if the food additives are not carry-overs but perform technical functions in organic processed foods and are considered as being used in those organic processed foods. (Note) "Carry-overs" are those used in the process of manufacturing or processing ingredients of foods, not in the process of manufacturing or processing the foods themselves, and are included in quantities less than those required to achieve technological functions.

(Q21-12)Is the use of refined salt with bittern derived from seawater permitted as dietary salt in processing of organic processed foods?

(A)

Dietary salts permitted in the processing of organic processed foods include refined salt and processed salt whose principal ingredient is sodium chloride. Please note that the use of salt with a flavor enhancer, food additives and various minerals is not permitted. The addition of natural bittern from seawater and rock salt is permitted.

(Q21-13)Non-organic ingredients should be no more than 5 percent of total ingredients. What is the calculation basis, an ingredient basis or a final product basis?

(A)

An ingredient basis. When the same kind of ingredients in different conditions such as undiluted, concentrated, or dried are used, ingredients should be calculated after converting them to an equivalent basis. Examples include straight juice and concentrated juice, liquid soup stock and powdered soup stock, arum root and konjac powder. Products dried and processed for the purpose of storage and preservation, such as concentrated juice and konjac powder, may be used as ingredients after water has been added they have been graded. Please note that the weight of processing aids is

excluded from the total weight of ingredients, as processing aids do not remain in final product.

(Q21-14) Is the use of ingredients that utilize recombinant DNA technology permitted in processed foods if they are no more than 5 percent of total ingredients in organic processed foods?

(A)

The use of ingredients applying recombinant DNA technology is prohibited even if they are no more than 5 percent of total ingredients.

(Q21-15) Is the use of microorganisms cultured with materials other than organic plants, organic processed foods and organic livestock products or materials modified by recombinant DNA technology permitted when manufacturing organic processed foods?

(A)

Since culturing materials for microorganisms are not considered to be direct ingredients of organic processed foods, in cases where it is unavoidable, it is permissible to use microorganisms cultured with:

- materials other than organic plants, organic processed foods and organic livestock products
- materials modified with recombinant DNA technology.

However, should culturing materials for microorganisms be used in significant quantity (5% or more) in the manufacturing of processed foods, and remain there without being removed, said materials will be viewed as ingredients.

(Q21-16) Why are organic foods for which organic ingredients constitute no less than 70 percent but below 95 percent not set forth in the JAS for Organic Processed Foods?

(A)

The Codex Guidelines permit the use of non-organic ingredients within the maximum level of 5 percent, where in cases organic ingredients are not available or are insufficient in quantity. *Member countries may consider standardizing products for which organic ingredients constitute between 70 and 95 percent that are marketed in their territory.* The JAS for Organic Processed Foods permits the use of non-organic products within the maximum limit of 5 percent, taking into account *the Codex Guidelines*, manufacturing practices and consumer preferences.

(Q21-17)The use of ionizing radiation for purposes of saving or sanitizing foods, including controlling noxious animals and plants, is prohibited. Is its use for process management purposes permitted?

(A)

The use of ionizing radiation for purposes of controlling noxious animals and plants and saving or sanitizing foods is prohibited, but permitted in process management for checking content quantities and shapes and inspecting for foreign objects. The exposure dose must be no more than 0.10 Gy. No restrictions shall be applied to X-ray inspections upon the customs clearance of imported foods.

(Q21-18)Is the use of chemosynthetic disinfectants or detergents permitted for cleansing plant products as ingredients of organic processed foods?

(A)

The use of those not listed in Attached Table 1 is prohibited due to the criteria for ingredients in Article 4 including processing aids.

(Q21-19)What kind of water is used as an ingredient of organic processed foods? Is the use of disinfectants such as sodium hypochlorite permitted for making well water drinkable?

(A)

Water for manufacturing foods must be drinkable as set forth in the Standard and Criteria of Foods and Additives (Notification No. 379 of the Ministry of Welfare, December 28, 1959). The use of chemical treatments such as electrolysis and the addition of chemosynthetic additives other than those listed in Attached Table 1 are prohibited. The use of sodium hypochlorite is permitted for making water drinkable, but not for other purposes in the manufacturing process.

(Q21-20)Is the use of detergents and disinfectants permitted for machines and equipment used in the processing process?

(A)

The use of detergents, ozone water and electrolysis water is permitted. Exposure of ingredients and products to detergents should be avoided by rinsing machines and equipment using water.

(Q21-21) Are production process managers able to include deoxidants in packing products?

(A)

The use of deoxidants may be permitted if organic products are not contaminated by

them.

(Regarding Article 5)

(Q22-1) Why is it necessary to clearly indicate that organic processed foods of plant and animal origin whose generic name is identical to that for organic processed foods of plant origin are not the latter?

(A)

1. “Organic processed foods of plant origin” are specified plant products for which standardizations of labeling names are deemed to be especially necessary. Labeling processed foods other than “organic processed foods of plant origin” in a manner that invites confusion with the latter is prohibited. Please note that only a few foods that fall under both “organic processed foods of plant origin” and “organic processed foods of plant and animal origin” based on percentages of ingredients must be labeled in a manner that clearly indicates that they are not organic processed foods of plant origin if they are not organic processed foods of plant origin (for example, foods for which dairy products constitute no less than 5 percent).
2. Specifying “organic livestock products,” “organic processed foods of animal origin” and “organic processed foods of plant and animal origin” as specified plant products is necessary in order to avoid the situation in 1. above. Specification is subject to consultation with the relevant part of the government, with the marketing of organic livestock products and processed foods after the revision of the JAS to be taken into account. However, specification is currently difficult because consumers are not misled due to livestock products and livestock processed foods being produced by methods different than those under the JAS for Organic Livestock Products and to the fact that there are few cases of such livestock products and livestock processed foods labeled as “organic” and sold on the market.

(Q22-2) What are examples of organic processed foods of plant and animal origin with the same generic names as organic processed foods of plant origin?

(A)

1. Labeling regulations apply to generic names when processed foods are produced by general methods and plant ingredients are no less than 95 percent of the total ingredients.
2. Labeling products other than “organic processed foods of plant origin” with the same name as the former is prohibited in cases under 1. above.
3. Labeling products with a name that invites confusion with organic processed foods of plant origin is prohibited for those products for which livestock ingredients constitute no less than 5 percent. This applies even if the production of said products

complies with all organic standards.

4. Examples include bread, noodles, crackers, cereals, chocolate, etc.

(Q22-3) What kinds of labels are permitted for organic processed foods of plant and animal origin that have the same generic names as organic processed foods of plant origin?

(A)

1. Out of organic processed foods of plant and animal origin, those products bearing names identical to the generic name of organic processed foods of plant origin may have the name of the livestock product used contained within their name or product description (“Organic Bread (contains X% organic milk)”), bear a label indicating “Organic Bread (a processed food of plant and animal origin),” etc. or otherwise include an explanation that the product is an organic processed food of plant and animal origin. This serves to clarify that the product is not an organic processed food of plant origin.

(Regarding Attached Tables)

(Q23-1) Is the use of items derived from recombinant DNA technology permitted as ingredients for manufacturing food additives?

(A)

The use of ingredients derived from recombinant DNA technology is not permitted. It is also necessary to verify whether or not ingredients derived from recombinant DNA technology are being used for non-primary ingredients as well. An example of such a non-primary ingredient would be ethanol, which is used as a sub-material that acts as a natural aromatic.

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

(A)

1. The use of only food additives listed in Attached Table 1 of the JAS for Organic Processed Foods is permitted for manufacturing or processing organic processed foods.

2. The use of calcinated calcium is prohibited because it is not included in Attached Table 1, but the use of those items that satisfy the conditions for calcium carbonates, which are listed in Attached Table, is permitted.

3. Labeling should follow the Food Sanitation Law and its ordinances, such as whether the food additive is labeled as “calcium carbonate” as listed on Attached Table 1 or as “shell calcinated calcium” as an existing food additive.

(Q23-3) Are certified re-packers or certified importers able to fill nitrogen in the tea packaging process?

(A)

Filling nitrogen in the tea packing process is a food additive addition. The JAS for Organic Processed Foods permits the use of food additives listed in Attached Table 1 only by certified production process managers of organic processed foods. Certification as production process managers is necessary for filling nitrogen.

(Q23-4) Why were the chemicals listed in Attached Table 2 of the JAS for Organic Processed Foods revised completely?

(A)

1. The previous chemicals listed in Attached Table 2 were rarely used for the process of manufacturing and processing.
2. Consequently, the list was completely deleted in the 2005 revision and new chemicals that meet *the Codex Guidelines* among chemicals generally used for pest control in the process of manufacturing and processing were added.
3. Moreover, in the 2012 revision, chemicals that are practically not used were erased.

(Q23-5) What kind of attractants or repellants for noxious animals and plants can be used in manufacturing, processing, packaging, storage and other facilities?

(A)

In addition to chemicals listed in Attached Table 2, items whose ingredients are foods and food additives can be used.

VI. Labeling

(Q24-1) Is labeling “organic ingredients are used” permitted for plant products and processed foods without Organic JAS logos?

(A)

1. The Quality Labeling Standards for Fresh Foods (Notification No. 514 of the Ministry of Agriculture, Forestry and Fisheries, March 31, 2000) provides for the labeling of generic names and their places of origin for plant products. Any confusing labeling to products without Organic JAS logos through which consumers misidentify the products as being organic is prohibited in cases where names or claims are labeled. Claims to emphasize the method of production, such as “organic fertilizer was used,” are permitted.

- (1) Examples of prohibited labeling for products without Organic JAS logos include:

organic, organic agriculture, full organic agriculture, full organic, overseas organic, semi-organic, organic rate xx%, direct from organic farm, organic (trademark registration), transition to organic culture, organic culture with rain cover, organic soil culture, organic taste, and certified organic in XX (name overseas country).

- (2) Examples of permitted labeling for products without the Organic JAS include: organic fertilizer is used and tomatoes cultivated with organic fertilizers. Please note that if the use of organic compost is emphasized on the label, it may confuse others to think that the plant products are produced by organic methods, which may violate label regulations.
2. The Quality Labeling Standards for Processed Foods (Notification No. 513 of the Ministry of Agriculture, Forestry and Fisheries, March 31, 2000) provides for the labeling of name, ingredients and other items in a collective panel. Any confusing labeling for products without Organic JAS logos is prohibited as well. Explanations on the use of organic ingredients with the Organic JAS is permitted with the exact organic percentage of the ingredient.
- (1) Examples of prohibited labeling for products without Organic JAS logos include: organic salad, organic vegetable sauce, organic tomato ketchup, ketchup certified as organic, sauce complying with organic standards, organic pasta, and explanations such as “products certified as organic in overseas.”
 - (2) Examples of permitted labeling for products without the Organic JAS but in which organic ingredients with Organic JAS logos are used: salad with organic vegetable (xx% of organic vegetables are used), organic ketchup using xx% of organic tomatoes, and tofu (xx% of organic soybeans are used).

(Q24-2) Is labeling “organic tomatoes without agricultural chemicals” permitted?

(A)

“The expression of organic and without agricultural chemicals” is not recommended as a label reading “without agricultural chemicals” may mislead consumers by giving the impression that there are no residual agricultural chemicals, the use of which has been prohibited by the May 2003 revision of the Labeling Guidelines for Specially Grown Plant Products. Please note that a label reading “organic tomatoes without agricultural chemicals” is prohibited as the labeling of organic products must comply with the Organic JAS.

(Q24-3) Does a label reading “organic rice” and “organically cultivated rice” comply with the Quality Labeling Standards for brown rice and polished rice?

(A)

The JAS for Organic Plants sets forth the labels of “rice (organic plants,” “organically

cultivated rice,” “rice (organic),” while the Quality Labeling Standards for brown rice and polished rice stipulates the labels of “brown rice” and “polished glutinous rice.” Polished non-glutinous rice is labeled either as “polished non-glutinous rice” or “polished rice.” In combination, “organic non-glutinous polished rice” or “organic polished rice” shall be labeled in the collective label, and “organic rice,” “organically cultivated rice,” “rice (organic),” or “organic polished rice” may be labeled as a trade name outside the collective label.

(Q24-4) Shall organic plants carry labels consisting only of names?

(A)

Organic plants shall be labeled with their name and place of origin in accordance with Article 5 of the JAS for Organic Plants and Article 3, Paragraph 1 of the Quality Labeling Standards for Fresh Foods (Notification No. 514 of Ministry of Agriculture, Forestry and Fisheries, March 31, 2000). The product shall be labeled as “organic plants” and a generic name such as “tomato.”

(Q24-5) Shall organic processed foods carry labels consisting only of names and ingredients?

(A)

The labeling of the names of organic processed foods is conducted as set forth in Article 5 of the JAS for Organic Processed Foods without prejudice to the Quality Labeling Standards for Processed Foods (Notification No. 513 of the Ministry of Agriculture, Forestry, Fisheries, March 31, 2000). For processed foods with individual quality labeling standards, labeling shall follow provisions under the relevant individual Quality Labeling Standard.

Ingredients shall be labeled in accordance with Article 3-1-2 of the Quality Labeling Standards for Processed Foods, such “organic XX” for organic foods, and “organic xx under transition period” for organic plants under the transition period. A generic name of food should be filled in XX.

Domestic operators shall label the net contents, the date of minimum durability, the storage instructions and the names and addresses of manufacturers as well as name and ingredients.

The importers may label the name and the ingredients in accordance with the JAS for Organic Processed Foods on behalf of the overseas production process managers when they import organic foods graded by overseas production process managers and collectively conduct labeling in accordance with the Quality Labeling Standards for Processed Foods.

(Q24-6) How are organic plants monitored?

(A)

The Regional Agricultural Administrative Offices, Regional Centers under Regional Agricultural Administrative Offices, and the FAMIC are responsible for monitoring organic plants in the market.

(Q24-7) Are labeling provisions on organic foods applicable to the food-service industry or home-meal replacement industry?

(A)

Labeling provisions on organic foods are applicable to the food-service industry and home-meal replacement industry when foods with Organic JAS logos are sold for taking-out. These are not applicable to leaflets, menus and banners to provide information to consumers, which may be regulated by the Act against Unjustifiable Premiums and Misleading Representations.

(Q24-8) Is certification as a production process manager necessary for selling plant products in accordance with the Organic JAS with consumer cooperation?

(A)

Certification as a production process managers is necessary if one is labeling the products “organic.” Cooperation between producers and consumers, a type of sales, should depend on mutual trust. A wide variety of information concerning production is disclosed and exchanged between them before and upon the purchase contracts. There will be no specific problems even if a label of “organic” does not appear on products because enough information are already disclosed by then.

Items other than products, packages, containers and invoices; in other words, leaflets to explain products and order forms, are not subject to labeling regulations.

1. Labeling subject to regulation:

- (1) Sticker for organic labeling attached to specified plant products;
- (2) Organic labels attached to containers, packages and invoices (delivery statements accompanying products) of specified plant products; and
- (3) Notice boards for organic labeling identifying that the displayed specified plant products are “organic.”

2. Information not subject to regulation:

- (1) Explanations of organic plants in the media of newspapers, magazines and websites, including those illustrating that they are “organic” by way of photos and illustrations of specified plant products;
- (2) Leaflets, pamphlets, newsletters and notice boards with the same explanations as above;
- (3) Statements to identify organic products among those supplied the following week

in order leaflets, including photos and illustrations;

- (4) Statements to identify organic foods in order forms; and
- (5) Newsletters accompanying delivered vegetable boxes in response to consumers' orders that serve to identify organic vegetables.

(Q24-9) I produce “natto” (fermented soybeans) from organic JAS-certified soybeans. May I sell them as “natto” for which organic soybeans were used, without Organic JAS logos but with the claim of “organic natto” on a notice board?

(A)

As described in the first paragraph of the answer to Q 24-8, organic labeling on a notice board is subject to regulations when it claims the displayed specified plant products as organic. Therefore, you cannot indicate “organic natto” on a notice board.

(Q24-10) How should products be labeled if they contain organic plants and plant products in transition to organic?

(A)

They should be labeled as “under the conversion period.” When both organic plants and organic plants under the conversion period are used as ingredients for organic processed foods, said foods should be labeled with “Organic XX under the conversion period” or “Organic XX (under the conversion period)” or contain a statement saying “under the conversion period” in close proximity of the product name or brand name. When placing a statement saying “under the conversion period” in close proximity of the product name or brand name, it is acceptable to write the name as “Organic XX,” etc.

(Q24-11) When labeling Organic JAS logos is using a stamp permitted? Are certified operators able to use Organic JAS logos made by themselves using personal computers?

(A)

Organic JAS logos should be managed and controlled in terms of the attached numbers. The use of stamps is permitted, if the used number is properly managed. The use of personal computers is permitted as well, if the prepared and used numbers are properly managed.

(Q24-12) Is labeling “organic XX used” permitted on fresh foods without Organic JAS logos?

(A)

1. The Quality Labeling Standards for Processed Foods permits labels reading “organic XX used” when processed foods are made from characteristic ingredients such as

organic plants. This does not cause any trouble for consumers when choosing foods, as ingredients used and processed foods, such as soybeans and *tofu*, are different and thereby do not create consumer confusion..

2. The Quality Labeling Standards for Fresh Foods does not have stipulations similar to the above, as fresh foods are neither manufactured nor processed. Labeling products that have simply been re-packed as “organic XX are used” is prohibited under Article 19-15-2 of the JAS Law, as it may confuse consumers by making them think that the product is “organic.”
3. Labels of “organic XX are used” are permitted only for fresh foods in cases where ingredients and products made from them are different, such as mug bean sprouts, and consumers are not misled. If all of them are not organic, labels of the organic percentage such as “contains 50% organic XX” is necessary.

(Q24-13) When packing agricultural processed foods labeled with Organic JAS logos in cardboard boxes with an indication of “organic XX” for shipment, is it necessary to attach Organic JAS logos to the cardboard boxes?

(A)

When individual packages for sale to consumers are all to be labeled with Organic JAS logos and cardboard boxes are only used for their shipment, it is permissible to indicate “organic” on the boxes without Organic JAS logos so as to identify that the boxes contain organic processed foods.

(Q24-14) May I distribute a free sample of rooibos tea without Organic JAS logos but with a label of “organic rooibos tea?”

(A)

It is set forth in Article 19-15, Paragraph 1 and 2 of the JAS Law that “no person shall attach the label of the name set forth the Japanese Agricultural Standards pertaining to the specified agricultural and forestry products or a confusingly similar label to any agricultural and forestry product other than the specified agricultural and forestry products,” regardless of whether such products are intended for sale or gift. Therefore, it is not permissible to label them “organic” without attaching Organic JAS logos, even if the product is intended as a free sample.

VII. Other

(Q25-1) How are organic products and fields handled if earth and sand flows from the surrounding areas into the organic fields due to natural disaster?

(A)

1. The organic fields may be affected by prohibited substances because of earth and

sand from surrounding areas brought in by river flooding and landslides triggered by natural disasters such as typhoons and earthquakes. The products cultivated at the time of disaster should not be graded as organic unless the inflow of prohibited substances into the fields can be clearly denied.

2. A certain period of time should be spent returning the soil of the damaged fields to organic e after the products have been harvested or removed. Products harvested within one year from the harvesting or removal of the products dating from the time of disaster may be labeled as “transition to organic,” and products harvested later on may be labeled as “organic.”