

Q & A
on
Inspection and Certification System of
Organic Foods

(UNOFFICIAL TRANSLATION)

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Standards and Labeling Division
General Food Policy Bureau
Ministry of Agriculture, Forestry and Fisheries

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I. Registered Certification Organization

1. What is Registered Certification Organization?

Q1. What kind of service do Registered Certification Organizations carry out?

Ans. Registered Certification Organizations certify (inspect and judge) Production Process Managers, Manufacturers and Sub-dividers (including respective foreign ones) and Importers based on the respective Technical Criteria for Certification, and also verify (check) if those certified operators are carrying out grading and labeling of grading appropriately. They also report the status of grading, etc. carried out by those certified operators to the Minister for Agriculture, Forestry and Fisheries.

Q2. Who are qualified to be Registered Certification Organization?

Ans. The recent revision of “The Law Concerning Standardization and Proper Labeling of Agricultural and Forestry Products” (hereinafter referred to as “the JAS Law”) has additionally allowed private profit-making corporations to be Registered Certification Organizations providing that any legal person which meets the Registration Criteria of Registered Certification Organizations provided in the JAS Law.

Q3. What classifications are there of the Registered Certification Organization for organic foods?

Ans. Article 55 of the Enforcement Regulations of the Law Concerning Standardization and Proper Labeling of Agricultural and Forestry Products (hereinafter referred to as “Enforcement Regulations of the JAS Law”) provides that there are four classifications for the registration of Registered Certification Organizations, where organic foods are classified into “Naturally Grown Chickens, Organic Agricultural Products and Organic Agricultural Product Processed Foods”. In the case of an application for the registration of organic foods only, you may make an application for any of (1) Organic Agricultural Products, (2) Organic Agricultural Product Processed Foods or (3) Organic Agricultural Products and Organic Agricultural Product Processed Foods (the application fees are all of the same).

For Organic Agricultural Products and Organic Agricultural Product Processed Foods, you may apply for limited items. In such a case, please put the statement to that effect in the application documents.

Q4. Article 15, Paragraph 1 of the JAS Law refers to “the Minister for Agriculture, Forestry and Fisheries or a Registered Certification Organization certifies”. What case is conceivable for the certification by the Minister for Agriculture, Forestry and Fisheries?

Ans. The revision of the JAS Law carried out recently aimed at utilization of private participation and deregulation, and opened the door to private profit-making legal persons so that they can be Registered Certification Organizations. Therefore, it is intended that certification service should fundamentally be provided by Registered Certification Organizations.

Such a case that the Minister for Agriculture, Forestry and Fisheries has to provide certification service is thought the case that there is no organization conforming to the standards for Registered Certification Organization. However, there have already been some Registered Certification Organizations for organic foods, and more legal persons have filed applications for registration. Therefore, we are sure that such a case would be inconceivable.

Q5. Are the local public entities of prefectures qualified to be Registered Certification Organization? Is the government’s authority delegated to them?

Ans. As each local public entity of prefectures has a legal person status (Local Autonomy Law, Article 2, Paragraph 1), it is qualified to be Registered Certification Organization if it satisfies the requirements for a Registered Certification Organization provided in the JAS Law. In this case, however, the authority of the government is not delegated to the local public entity, but it becomes qualified by obtaining the registration of the Minister for Agriculture, Forestry and Fisheries, as is the case with private corporations. In applying for registration, therefore, it is required to submit the application documents stipulated under Article 54 of the Enforcement Regulations of the JAS Law to the Minister for Agriculture, Forestry and Fisheries and to obtain the approval of its certification fees and certification business rule.

Q6. In giving private corporations an authority to certify, should it not be limited severely?

Ans. In the recent revision of the JAS Law, it was legislated that Registered Certification Organization would be opened to private companies, while it was also arranged to ensure a fair implementation of certification service by Registered Certification Organizations. In the case that the members or the composition of personnel and another business in which they

are engaged provided as to the kind of officers and legal persons under the provisions of Article 50 quoted in Article 57 of the Enforcement Regulations of the JAS Law are likely to affect the neutrality and fairness of certification service, it is intended that such corporation will not be registered as a Registered Certification Organization.

Q7. Is it possible for a Registered Certification Organization to have its peculiar standard for “organic” and carry out its certification activities based on such a standard?

Ans. A Registered Certification Organization certifies Manufacturers, etc. according to “the Technical Criteria for certification of manufacturers of Organic Agricultural Product Processed Foods”, etc. (hereinafter referred to as “Technical Criteria for Certification”). In addition to the above, it may carry out the certification service based on its own standard. In this case, though you may carry out your own certification according to the Technical Criteria for Certification with its additional requirements added, you may not substitute the certifications under the JAS Law for those based on the conformity with your own standard different from the Technical Criteria for Certification. The certification under the JAS Law is nothing other than a certification of the conformity to the requirements set forth in Technical Criteria for Certification.

Note that it is possible to carry out the certification under Technical Criteria for Certification concurrently with that based on your own standard.

Q8. If a certifying body composing of its members becomes a Registered Certification Organization, is it allowed for the body to carry out its certification activities only for its members? Is it also allowable to coerce the certification based on its own standard?

Ans. Registered Certification Organizations must carry out the certification regardless of membership. They may not coerce the certification based on its own standard.

Q9. Is it allowable for Registered Certification Organization to perform consulting services to those who seek to apply for certification?

Ans. Registered Certification Organization may not perform to those who seek to apply for certification such consulting services as beforehand instruction of specified measures, means and way of improvement, etc. for a successful certification.

However, explanation of the inspection and certification system, Japanese Agricultural Standards, application procedures, certification fees and other general matters does not fall

under the consulting services, since it is the information supply.

It is not thought the consulting services to point out the matters and parts that fail to conform to the Technical Criteria for Certification and suggest the necessity to correct them (without advising about the concrete way of improvement but leaving them to the discretion of the applicant) at the time of on-site inspection in relation to the application for certification.

Q10. Are the local governments and private certification bodies of foreign countries that are currently carrying out their certification service qualified to be Registered Foreign Certification Organizations?

Ans. For the registration as a Registered Foreign Certification Organization, the organization which wants to be registered as a Registered Foreign Certification Organization must have its business establishment in a country that is deemed to have the system equivalent to that of Japan by the Minister for Agriculture, Forestry and Fisheries. If the country is recognized as a country having equivalence by the Minister for Agriculture, Forestry and Fisheries, such an organization can make an application for registration for a Registered Foreign Certification Organization.

Q11. Is it allowable for a Registered Foreign Certification Organization to carry out the certification of Production Process Managers, etc. in other countries than the said country (where its office is situated)?

Ans. It is allowable for the said Registered Foreign Certification Organization to send its personnel from its business establishment to the countries (excluding Japan) other than the said country for the certification of Production Process Managers, etc.

In that case, the said foreign countries must be included in “the area where certification service is carried out” that is to be defined at the time of application of the said organization.

Q12. Is it allowed for a Registered Foreign Certification Organization of A country to conclude a trust contract of providing inspection data with a certification body in B country (excluding Japan), and the Registered Foreign Certification Organization can certify Production Process Manager(s) in B country by utilizing the results of inspection carried out by the said certification body?

Ans. Yes, it is. In this case, the said certification body should be that which conforms to the requirements described in the following (1) and (2):

- (1) an organization recognized or registered as a certification body by the government of B country, the local government of B country or an international organization with an established reliability (ISO, IOAS) (including the cases that the government of B country or the local government of B country are carrying out the certification service by themselves)
- (2) an organization that has a considerable experience as a certification body for organic foods

When you plan to use the result of inspection carried out by such a certification body, you are requested to communicate in advance with Standards and Labelling Division, General Food Policy Bureau, the Ministry of Agriculture, Forestry and Fisheries.

(Note) IOAS = International Organic Accreditation Service Inc., an organization that is carrying out the certification service in accordance with the certification standard prepared by IFOAM (International Federation of Organic Farming Movement).

Q13. Is it allowable for a Registered Certification Organization to use the data obtained by the past on-site inspection in certifying Foreign Production Process Managers, etc.?

Ans. A Registered Certification Organization is required to carry out an on-site inspection in the certification service so as to judge whether the applicant operator meets the Technical Criteria for Certification.

If the on-site inspection of the said applicant operator was carried out by the organization ① recognized or registered as a certification body by the foreign government agency, the local government of foreign country or an international organization with an established reliability (ISO, IOAS) (including the cases that government agencies or local governments of foreign countries are carrying out the certification services by themselves) and ② having a considerable performance as a certification body for organic foods, and if the said Registered Certification Organization judges that the then data is still effective, then such data of the on-site inspection can be used for the certification (the data obtained more than one year ago is not thought effective). If you plan to utilize such data, you are required to communicate in advance with Standards and Labeling Division, General Food Policy Bureau, the Ministry of Agriculture, Forestry and Fisheries.

However, if such inspection data is utilized but not enough to judge for the certification, you must perform the on-site inspection again.

2. Registration of Registered Certification Organization

Q14. What extent is meant by “satisfactory financial foundation” for Registered

Certification Organization?

Ans. It is intended to judge whether the organization has a satisfactory financial foundation according to the following matters:

- (1) The budgets of revenue and expenses for the fiscal year belonging to the date of application and the next fiscal year are well balanced.
- (2) There is no accumulated loss.

Q15. What are the judgment criteria for financial foundation of local public entities?

Ans. Local public entities are thought to have enough financial foundation.

Q16. Is it allowable for officers of a Registered Certification Organization to be composed of solely Producers who are going to apply for certification or who have already received certification?

Ans. Producers who are going to apply for certification or who have already obtained the certification may become officers of a Registered Certification Organization. However, in the case that the number of the said Producers exceeds 50% of the present number of officers or that the shares possessed by them exceeds 50% of the total outstanding shares, and that the certification is not deemed to be carried out under the responsibility and authority of the person who has no interest in the agricultural and forestry product covered by the certification, such an applicant for Registered Certification Organization is deemed not to satisfy the requirement for registration.

It is also natural that the said officer should not be concerned in the certification for himself.

Q17. What is meant by the case that “another business in which they are engaged are likely to affect the neutrality and fairness of certification service”?

Ans. The following are typical examples:

- (1) The case that the person is engaged in producing / manufacturing Organic Agricultural Products / Organic Agricultural Product Processed Foods
- (2) The case that the certification service is deemed to have direct interests in the said another business in which the person is engaged (for example, consulting services for product design and brokerage business of the product covered by the certification, etc.)

Q18. What is the necessary procedure for the case where a Registered Certification Organization wants to carry out the certification of the product item other than specified in Certification Business Rules for the Registration?

Ans. It is necessary to obtain an approval of the change of the Certification Business Rules by the Minister for Agriculture, Forestry and Fisheries. You are required to file an application for the change of the Certification Business Rules via Center for Quality Control and Consumers Service.

Q19. What are the “Matters relating to the management of certification service of Registered Certification Organizations” included in the matters to be entered in the application form for registration?

Ans. They are as provided in the column for the Matters relating to the management of certification service of “the Registration Criteria as a Registered Certification Organization or Registered Foreign Certification Organization Regarding Naturally Grown Chicken, Organic Agricultural Products and Organic Agricultural Product Processed Foods” (hereinafter referred to as “Registration Criteria as a Registered Certification Organization”).

[For reference] Matters relating to the management of certification service

1. The rules for service describing the matters cited below have been established and the certification service is being carried out in accordance with the rules.
 - (1) Rules on the policy to carry out the certification service appropriately and for familiarizing every people engaged in the said service with the policy
 - (2) Rules on the mutual independence of the section to inspect the conformity to the Technical Criteria for Certification and the section to judge whether to certify based on the results of the said inspection, and the clear provisions of its authority and responsibility
2. The internal audit system has been established to ensure that its certification service is carried out appropriately.

3. Certification service

Q20. What are the contents of service of “the section to inspect the conformity to the Technical Criteria for Certification” referred to in the column “Matters relating to the management of certification service” in Registration Criteria as a Registered Certification Organization?

Ans. The contents of service of the inspection section are the examination of documents of application for certification, on-site inspection at the fields, factories, etc. and preparation

of its reports.

Q21. What are the contents of service of “the section to judge whether to certify based on the results of the said inspection” provided in the column “Matters relating to the management of certification service” in Registration Criteria as a Registered Certification Organization?

Ans. The contents of service of the judgment section are the judgment of whether the certification should be given or not based on the documents of application for certification, on-site inspection reports (including the materials and photos made available by the on-site inspection) and other materials necessary for judgment.

Q22. Is it allowed to make the judgment by a single person, not by a committee?

Ans. A person with the qualification provided in the column “Qualifications of the persons engaging in certification service” in the Registration Criteria as a Registered Certification Organization may give a judgment by himself.

Q23. How is the result of certification notified to the applicant?

Ans. If it is decided to certify the applicant, the head of the Registered Certification Organization will issue the certificate carrying: ① Kind of agricultural and forestry product to be covered by the certification, ② Name and address of the fields and factories covered by the certification, ③ Certification number, ④ Date of certification, ⑤ The name or trade name and address, etc. of the Production Process Manager to whom the certification is given. If it is decided not to certify the applicant, the head of Registered Certification Organization will notify the applicant to that effect together with its reasons.

Q24. What is meant by “designated” in “seminar designated by the Registered Certification Organization” provided in the Technical Criteria for Certification?

Ans. The seminars designated by Registered Certification Organizations will be those given by the Registered Certification Organization or those run by other organizations (e.g. Japanese Agricultural Standards Association).

Q25. What should be given by the seminars of Registered Certification Organizations?

Ans. Registered Certification Organizations are required to familiarize the certified operators with the purpose and scheme of the inspection and certification system for organic foods under JAS system so that those certified operators carry out the appropriate grading.

In the seminars given by Registered Certification Organizations, it is necessary to give a general explanation on this system, for example: ① The JAS Law, ② Inspection and certification system for organic foods, ③ Japanese Agricultural Standards for Organic Agricultural Products and Organic Agricultural Product Processed Foods, ④ Technical Criteria for Certification and ⑤ Procedures for certification, and also respective courses depending on the kind of people receiving the seminars as follows:

- (1) In the case of Manufacturers of Organic Agricultural Product Processed Foods
 - a. The courses on quality control of Organic Agricultural Product Processed Foods should include the matters on acceptance and storage of raw materials, formulation ratio of ingredients, manufacturing and processing methods, equipment and tools used for manufacturing and processing, and shipment.
 - b. The courses on grading of Organic Agricultural Product Processed Foods should include the matters on inspection of production process, labeling of grading, shipment or disposal of the lot of products after graded, making records and storing them.
- (2) In the case of Production Process Managers of Organic Agricultural Products
 - a. The courses on the management or grasp of production process of Organic Agricultural Products should include the matters on procurement of seeds and seedlings and substances, manuring practice and control of harmful organisms, transport, sorting, preparation, cleaning, packaging and other processes and shipment.
 - b. The courses on grading of Organic Agricultural Products should include the matters on inspection of production processes, labeling of grading, shipment or disposal of the lot of products after graded, making records and storing them.
- (3) In the case of Sub-dividers of Organic Agricultural Products and Organic Agricultural Product Processed Foods
 - a. The courses on sub-dividing should include the matters on acceptance and storage of Organic Agricultural Products and Organic Agricultural Product Processed Foods, confirmation of the labels of grading of Organic Agricultural Products or Organic Agricultural Product Processed Foods before sub-dividing, sub-dividing methods and equipment and tools used for sub-dividing.
 - b. The courses on labeling of grading should include the matters on labeling of grading, shipment or disposal of the lot of products, making records and storing

them.

- (4) In the case of Importers of Organic Agricultural Products and Organic Agricultural Product Processed Foods
- a. The courses on the acceptance and storage of imported products should include the matters on acceptance and storage of Organic Agricultural Products and Organic Agricultural Product Processed Foods.
 - b. The courses on labeling of grading should include the matters on labeling of grading, shipment or disposal of the lot of products, making records and storing them.

Q26. If Registered Certification Organizations becomes too closely related with the side receiving the certification in the seminars run by Registered Certification Organizations, would it not work against neutral certification?

Ans. The seminars are carried out to familiarize the certified operators with the purpose and scheme of the inspection and certification system of organic foods under the JAS system, ensuring the reliability of inspection and certification system. Therefore, it would not impair the neutrality of certification service.

Q27. How often do Registered Certification Organizations conduct their investigation of Certified Production Process Managers, etc.?

Ans. To confirm whether the certified operators conform to the Technical Criteria for Certification and carry out the grading and the labeling of grading appropriately, it is necessary to carry out the investigation once or more a year. Urgent investigation is also allowable if an extraordinary investigation is deemed necessary.

Q28. A Registered Certification Organization has an authority to certify Production Process Managers, but not an authority to cancel the certification. In an event that there occurs a cause for cancellation, it will take some time until it is dealt with by the Minister. Is there any help but to leave it untouched by the Registered Certification Organization all the while? And does it become responsible for having certified such Production Process Manager?

Ans. If any Registered Certification Organization conducts an investigation its certified operator and finds it fall under the cause for cancellation, the organization must report on it to the Minister for Agriculture, Forestry and Fisheries via Center for Quality Control and Consumers Service without delay. Upon receipt of the report, the Minister for Agriculture,

Forestry and Fisheries will take an appropriate action. In such a case, however, if the certification service has been properly carried out, the Registered Certification Organization is not to blame. It is a policy not to deal with the said organization for cancellation of the registration, etc.

4. Persons engaging in certification service

Q29. What are the qualifications of those who are engaged in certification service?

Ans. They are as provided in the column “Qualifications of the person who is engaged in certification service” in Registration Criteria as a Registered Certification Organization.

[For reference] Qualifications of the persons engaged in certification service

1. A person who acquired the credits of the respective school subjects described in the middle column of the Attached Table for each category of agricultural and forestry products described in the left column of the Attached Table in a university under the School Education Law (Law No. 26 of 1947) or a school equivalent to or higher than a professional school under the former Professional School Ordinance (Imperial Ordinance No.61 of 1903) and graduated therefrom or a person who has the attainments equivalent to or higher than those and also has the experience engaged in the practical work described in the right column of the same table for each category of the agricultural and forestry products cited in the left column of the Attached Table for three years or more.
2. A person who acquired the credits of the respective school subjects described in the middle column of the Attached Table for each category of the agricultural and forestry products described in the left column of the same table in a high school or a secondary education school under the School Education Law or a secondary school under the former Secondary School Ordinance (Imperial Ordinance No.36 of 1943) or a school in any foreign country equivalent to the above-mentioned schools and graduated therefrom or a person who has the attainments equivalent to or higher than those and also has the experience engaged in the practical work described in the right column of the same table for each category of the agricultural and forestry products cited in the left column of the Attached table for four years or more.
3. A person who has the experience engaged in the practical work described in the right column of the Attached Table for each category of the agricultural and forestry products described in the left column of the same table for five years or more.
4. A person who is deemed to have the attainments equivalent to or higher than the persons defined from the items 1 to 3 above.

Attached Table

Categories of Agricultural and Forestry Products	School Subjects	Practical Works
Organic Agricultural Products	School subjects concerning the production of agricultural products	Production of agricultural products or guidance, investigation or experiments and research concerning production of agricultural products

Organic Agricultural Product Processed Foods	School subjects concerning the manufacturing and processing of drink and foods	Manufacturing or processing of drink and foods or investigation or experiments and research of them
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Q30. Does a person to be engaged in the inspection of a Registered Certification Organization need to take an examination?

Ans. As the qualification for persons engaged in the certification service is provided under the Registration Criteria as a Registered Certification Organization established by the Minister for Agriculture, Forestry and Fisheries, any person satisfying the requirements for the qualification may become a person engaged in the inspection. There is no examination program for a person to be engaged in the inspection.

Q31. What are the “School subjects concerning the production of agricultural products” referred to in the Registration Criteria as a Registered Certification Organization?

Ans. The said school subjects concerning the production of agricultural products include agricultural production, science of soil and plant nutrition, development of plant, plant pathology and plant physiology.

Q32. What are “guidance, investigations and experiments and researches concerning the production of agricultural products” in the Registration Criteria as a Registered Certification Organization?

Ans. The said guidance concerning the production of agricultural products include technical guidance for cultivation conducted by farming adviser or agricultural extension workers or guidance conducted by responsible persons for verification provided under the “Guidelines for Labeling concerning Organic Agricultural Products and Specially Grown Agricultural Products” established by the Ministry of Agriculture, Forestry and Fisheries.

The said investigations and experiments and researches concerning the production of agricultural products include the investigations of growth and development and the experiments and researches concerning the agricultural production conducted by seeds and seedlings producers, fertilizers manufacturers, pesticides manufacturers or public or private research institutions, and the inspection and certification service for organic agricultural products, etc.

Q33. What is “Manufacturing or processing of drink and foods or investigation or experiments and researches of them” referred to in the Registration Criteria as a

Registered Certification Organization?

Ans. They include the works in the sections of manufacturing, processing, quality control, product development and experiments and researches of drinks and foods.

Q34. What kinds of persons are included in “A person who is deemed to have the attainments equivalent to or higher than the persons defined in the items 1 to 3 above” referred to in the Registration Criteria as a Registered Certification Organization of Organic Agricultural Products, etc.?

Ans. A person having the qualification for agriculture included among the technologies under “Law concerning Professional Engineers”, a person specialized in agriculture or foods and drinks who is equivalent to or higher than a Provisional Auditor under the accreditation of JAB (Japan Accreditation Board for Conformity Assessment), or a person qualified as an inspector by an international established and reliable organizations, e.g. ones certified by IOAS, ones satisfying the standard provided in ISO guide 65, etc.

(Note) IOAS = International Organic Accreditation Service Inc., an organization that is carrying out the certification service in accordance with the certification standard prepared by IFOAM (International Federation of Organic Farming Movement).

Q35. Is it allowable to appoint a person engaged in the certification service outside the organization?

Ans. As far as a person engaged in the certification service is concerned, it is enough for a Registered Certification Organization to have the necessary number of staff qualified as a person engaged in the certification service as provided in the Registration Criteria as a Registered Certification Organization, regardless of the type of employment and contract.

Q36. Are the consumers allowed to engage in the certification service of a Registered Certification Organization?

Ans. As the qualification of a person engaged in the certification service is provided as “the standard for qualification of persons engaged in the certification service” in the Registration Criteria as a Registered Certification Organization, a person not falling under the standard is not qualified for a person engaged in the certification service. However, any consumer without the qualification may perform the inspection accompanying the person

engaged in the inspection or be appointed as a committee person of the judgment committee. In the case that a person without qualification is appointed to the judgment committee, the judgment is made by those persons qualified to judge based on the discussion made at the committee meeting(s).

Q37. Are the head of a Registered Certification Organization able to serve concurrently as an inspector or a person qualified to judge?

Ans. The head of a Registered Certification Organization may serve concurrently as an inspector or a person qualified to judge. However, he is required to perform a fair inspection or judgment without exercising his authority as the head in the inspection or judgment work.

Q38. Is it allowed for Producers to be the president or a person engaged in the certification service? In that case, can he be Certified Production Process Manager, etc.?

Ans. Producers may become the head of a Registered Certification Organization or a person engaged in the certification service. He may also apply for a Certified Production Process Manager, provided, however, that he may not be engaged in the certification service concerned in his own application.

Q39. How are the graduates from National Farmers Academy treated in the qualification for the certification service?

Ans. A graduate from National Farmers Academy having four or more years' experience of engaging in the practical work cited in the right column of the Attached Table in the Registration Criteria as a Registered Certification Organization is deemed to come under Item 4 of the column "Qualification of a person engaged in the certification service" of the said standard.

Note that the graduates from Prefectural Farmers Academies are handled as equivalent to the graduates from a junior college under the School Education Law.

5. Certification fee

Q40. How should the fee necessary for certification be calculated?

Ans. It is provided that a Registered Certification Organization should set the fees required for certification by adding up personnel expense, office expenses, supplies costs,

traveling expenses, per diem allowance, and hotel charges, etc. and the amount of fees is subject to the approval of the Minister for Agriculture, Forestry and Fisheries.

Q41. What level is meant by “The amounts of fees shall not exceed the costs and expenses necessary for the proper implementation of the said certification service.” that is the requirement for approval of certification fees?

Ans. It is provided that personnel expense, office expenses and other costs and expenses, traveling expenses (including railway fares, boat fares, air fares and taxi fares), per diem allowance, and hotel charges as the base for calculation of the amounts of fees should first be made clear and then the certification fees should be calculated by totaling them.

The examination for an approval is made to confirm that ① their unit prices for addition are clear and ② the addition has been performed based on these unit prices. If the certification fees are set based on them, the proposed certification fees are deemed not to exceed the costs and expenses necessary to carry out the certification service, and such an application will be approved.

Meanwhile, if ① their unit prices are not clear, ② the addition has not been made using these unit prices, or ③ the expenses other than these prices are added without any ground for adding up, it cannot be said or judged that the proposed certification fees are deemed not to exceed the costs and expenses necessary to carry out the certification service, and such an application will not be approved.

The certification fees to be covered by the approval include the expenses for ① checking of the application documents submitted by Production Process Managers, etc., ② formulation of an examination plan for certification, ③ examination of documents, ④ on-site inspection and preparation of its report, ⑤ judgment (judgment committee meeting), ⑥ making of the certificate and ⑦ other affairs essential for the certification service.

The costs and expenses of seminars designated by the Registered Certification Organization, on-site investigation after certification and the affairs for the preparation of report on the grading results are also included in the certification fees to be covered by the approval.

If an applicant sets other expenses (admission fee, purchasing money of documents, royalty, etc.), they are not covered by the approval.

Q42. In the case of the certification by prefectures, some prefectures did not take certification fees. Is it all right for a Registered Certification Organization to set a free certification fee?

Ans. Since it is provided that a Registered Certification Organization should set the fees required for certification by adding up personnel expense, office expenses, supplies costs, traveling expenses, per diem allowance, and hotel charges, etc., prefectural governments are required to set reasonable fees for their certification services based on the addition of those costs and expenses.

Q43. If the Registered Certification Organization is run by membership, is it allowable to discriminate the certification fees between the members and the non-members?

Ans. It is allowable to discriminate the certification fees between the members and the non-members.

6. Supervision of Registered Certification Organizations

Q44. In what manner is the inspection of Registered Certification Organization carried out?

Ans. The visiting inspection of Registered Certification Organization is carried out by Center for Quality Control and Consumers Service having the jurisdiction over the location of the Registered Certification Organization once or more a year as to whether the said Registered Certification Organization is carrying out the appropriate certification services in accordance with its certification business rules. The Center for Quality Control and Consumers Service having the jurisdiction will adjust the schedule and contents of inspection with the said Registered Certification Organization in advance. For the inspection, records and documents such as the inspection report concerning the certification service, relevant rules, revenue and expenses budget and results are necessary.

Q45. Isn't it necessary to perform unannounced inspection of the fields of Certified Production Process Managers or the factories of Certified Manufacturers?

Ans. A Registered Certification Organization must carry out the investigation of its Certified Production Process Managers and Manufacturers once or more a year. If deemed necessary, it carries out unannounced investigations in some cases.

Q46. Does the local public entities undergo the inspection by the government?

Ans. A Registered Certification Organization must, even if it is a local public entity, undergo the inspection to ensure a proper implementation of certification service.

II. Production Process Manager

Q47. What is the scope of work for Certified Production Process Managers?

Ans. A Certified Production Process Manager manages or grasps the production process of each field, makes the records, perform the grading of the agricultural and forestry products produced there, and may attach the labels of grading (Organic JAS Mark).

Q48. Is a producer who had been engaged in the production of organic agricultural products before the start of this system deemed to be a Certified Production Process Manager upon the enforcement of the JAS Law?

Ans. Even if it is a producer who has been wrestling with the production of organic agricultural products, he must receive the certification by Registered Certification Organization.

Q49. If there is no management record of the field, is it possible to make an application for certification to be a Certified Production Process Manager?

Ans. Unless you have the records of cultivation management under “the Guidelines of Labeling Concerning Organic Agricultural Products and Specially Grown Agricultural Products”, the records of cultivation management in accordance with a private certification system or the management records made by yourself for the cultivation under the Japanese Agricultural Standard for Organic Agricultural Products for the past one or more years, you are not qualified to apply for certification.

Q50. If we raise three or four crops a year in the same field, is the certification necessary for each crop?

Ans. The certification is granted for each field. Once you have obtained the certification, you may raise crops any times.

Q51. Is there any term of validity for the certificate for a field?

Ans. Once the certification is granted, it is valid unless cancelled, subject to the investigations by the Registered Certification Organization after certified.

Q52. Is it allowed for Production Process Manager to serve as the person in charge of grading concurrently?

Ans. It is desirable that Production Process Managers and the person in charge of grading should be separated to perform the respective works appropriately. However, in the case that the Registered Certification Organization recognizes a single person is able to perform both of the works since the field to be certified is small in number or area, the Production Process Manager may serve as a person in charge of grading concurrently.

Q53. Are the fields on which a certification body gave the certification before it is registered as a Registered Certification Organization deemed to be those conforming to the JAS standard on its registration?

Ans. Any field certified by a certification body before it is registered as Registered Certification Organization must be certified again by the Registered Certification Organization to be recognized as the field satisfying the relevant JAS standard.

Q54. How can we calculate the number of Production Process Management Staffs enough to manage or grasp the fields depending on the number of fields and the status of their dispersion?

Ans. It depends upon the number or status of dispersions of the fields. Generally speaking, first calculate the number of fields where a Production Process Management Staff is able to manage or grasp its production processes during a year, and then divide the total number of fields by the calculated number, and you will get the minimum necessary number of Production Process Management Staffs.

Q55. Is there any format for the management record of production process?

Ans. It suffices that the matters necessary for grading are described and can be verified as the management records regardless of any format. For your information, please refer to “a sample format for the management record of production process” attached to “Certification Service Manual for Production Process Managers of Organic Agricultural Products” compiled by the Committee of Guidelines for the Inspection of Organic Foods (Japanese Agricultural Standards Association). (URL of Japanese Agricultural Standards Association is <http://www.jasnet.or.jp>)

Q56. How can we make the confirmation referred to as “confirmation of whether the management records of the said production process corresponds to the said production lot”?

Ans. The confirmation is made by comparing the said production lot with the management record on its production.

Q57. Can we attach Organic JAS Marks to those agricultural products which have been harvested and stored before the certification for a Certified Production Process Manager is given or those in the process of cultivation at the time of certification?

Ans. Certified Production Process Managers may attach Organic JAS Marks to those agricultural products which have been harvested and stored after the enforcement date of the revised JAS Law (June 10, 2000) or those in the process of cultivation at the time of certification if the Registered Certification Organization can recognize the conformity to the Japanese Agricultural Standard in view of the records on the production of the agricultural products and the status of storage.

Q58. How can we deal with the conventional bags on which the labeling of organic agricultural products appears?

Ans. The regulation on labeling of Specified Agricultural and forestry products will be applicable on and after April 1, 2001. If you are certified as a Certified Production Process Manager by that time, you can use them as they are with Organic JAS Marks attached.

Q59. I am planning to have the certification as a Certified Production Process Manager and engage in the production of Organic Agricultural Products. Whom can I contact to have the information about what and how to do?

Ans. To be certified as a Production Process Manager, it is necessary to make records for one or more years evidencing that the field satisfies the criteria for manuring practice in the field, seeds and seedlings to be sowed or planted in the field, and control of harmful organisms in the field, etc. under Article 4 of the Japanese Agricultural Standard for Organic Agricultural Products and to submit them to the Registered Certification Organization. If you are going to cultivate organic agricultural products from now, you are required to make the said records.

For the procedures of application for certification and the contents of the Certification Criteria, contact any Registered Certification Organization. The locations and other

information about Registered Certification Organizations are available in the web pages of the Ministry of Agriculture, Forestry and Fisheries (<http://www.maff.go.jp/soshiki/syokuhin/heyah/HEYA.html>), the web pages of Center for Quality Control and Consumers Service (<http://www.cgccs.go.jp/index.html>) or the web pages of Japanese Agricultural Standard Association (<http://www.jasnet.or.jp>).

III. Manufacturers

Q60. If vegetable salad is made from organic vegetables at supermarkets, is it necessary to be Certified Manufacturers to attach Organic JAS Marks to the product?

Ans. A plural of vegetables are cut and mixed to make a product (e.g. organic vegetable salads) come under Organic Agricultural Product Processed Foods. If you put them on the market bearing Organic JAS Marks, you are required to be Certified Manufacturer.

Q61. If a farmer processes the Organic Agricultural Products which he has produced by himself and sells them as Organic Agricultural Product Processed Foods, is it necessary for him to be a Certified Manufacturer?

Ans. Yes, it is.

Exceptionally, in the case of tea, crude tea or lower graded tea can be labeled “organic” as the Certified Production Process Manager. However, if you make it into a manufactured tea and label it “organic”, you must be Certified Manufacturer.

Q62. In the case that a small-scale farmer becomes Certified Manufacturer, isn't it difficult for him to organize so that the grading section has an organization and authority substantially independent of the manufacturing section and sales section?

Ans. To ensure the reliability of JAS System, even if it is a small-scale farmer, it would not be certified as a Certified Manufacturer unless the Technical Criteria for Certification is satisfied. In the Technical Criteria for Certification, it is provided that “the grading section has an organization and authority substantially independent of the manufacturing section and sales section”. It is, therefore, necessary for the grading section to have at least one person in charge of grading (in this case, not to belong to the manufacturing and sales sections is a requisite).

Q63. In the case that part of the manufacturing process for an Organic Agricultural Product Processed Foods is outsourced, is the factory of the outside manufacturer required to be a Certified Manufacturer?

Ans. It is not necessary for the outside manufacturer to be certified as a Certified Manufacturer separately. However, when the entrusting manufacturer applied for certification, the entrusting manufacturer is required to describe clearly the said factory of the outside manufacturer in accordance with the provisions reading as “Names and locations of factories or places of business where the said agricultural and forestry products are manufactured or processed” under Article 29, Item 3 of the Enforcement Regulations of the JAS Law, thereby obtaining the certification in one united body with the outside manufacturer. In the case that a Certified Manufacturer changes the outside manufacturer or that it adds another factory for outsourcing, it is required to submit a notification of alteration to the Registered Certification Organization.

Q64. Miso (soybean paste) is subjected to aging for one to two years after fermented. Isn't it necessary for the miso industry to be given a two-year postponement of the enforcement?

Ans. The regulation on labeling of Specified Agricultural and Forestry Products will be applicable on and after April 1, 2001. Therefore, the products shipped before April 1, 2001 are not covered by the regulation. Also, if any *miso* manufacturer recognized as a Certified Manufacturer obtains the certification by the Registered Certification Organization that the raw materials used meet the JAS standard, such a manufacturer may attach the labels of Organic JAS Mark to those products which were fermented prior to the certification on or before March 31, 2001.

Q65. Are Certified Manufacturers unable to manufacture and sell Organic Agricultural Product Processed Foods unless they employ the raw materials bearing Organic JAS Marks?

Ans. Organic Agricultural Product Processed Foods manufactured or processed by Certified Manufacturers must conform to the “Japanese Agricultural Standard for Organic Agricultural Product Processed Foods”. Therefore, the Organic Agricultural Products as their raw materials must be those graded by Certified Production Process Managers and bearing Organic JAS Marks.

However, it will be difficult for Registered Certification Organizations to certify all of the Production Process Managers who want to have the certification in a short time, and it is

also expected that there would be not so much quantity of distribution of those Organic Agricultural Products as raw materials bearing Organic JAS Marks for some time following the enforcement of the revised JAS Law. In view of the foregoing, it is temporally allowed to employ those Organic Agricultural Products not bearing Organic JAS Marks as the ingredients for Organic Agricultural Product Processed Foods for the time being only if they are recognized by a Registered Certification Organization to conform to the Japanese Agricultural Standard for Organic Agricultural Products.

Q66. Neither can Certified Foreign Manufacturers manufacture and sell Organic Agricultural Product Processed Foods unless they employ the raw materials bearing Organic JAS Marks?

Ans. If, in foreign countries where it is not obligated to attach Organic JAS Marks, producers and manufacturers have to be certified by Registered Certification Organizations, etc. and

distribute those products bearing Organic JAS Marks only for the ingredients of the processed foods manufactured by Certified Foreign Manufacturers for export to Japan and the said foreign manufacturers have to manufacture Organic Agricultural Product Processed Foods using those raw materials bearing Organic JAS Marks in the said foreign countries, it would be an unbearable burden and unrealistic.

Meanwhile, Article 15-7 of the JAS Law provides that Organic Agricultural Products and Organic Agricultural Product Processed Foods certified under the system of the country which is set forth as a country having an equivalent system in the Ministerial Ordinance are nearly equivalent to the Organic Agricultural Products and Organic Agricultural Product Processed Foods which have been certified under the JAS System under their systems for production and handling for the distribution in the said foreign country under the JAS System, and Certified Importers may attach Organic JAS Marks to the products imported to Japan.

Under the circumstances, Certified Foreign Manufacturers are allowed to manufacture or process Organic Agricultural Product Processed Foods using the raw materials bearing the labels of grading as organic farm produces or processed foods under the said grading systems of the “countries having a grading system judged to be at a level equivalent to that of the grading system under the Japanese Agricultural Standards” as set forth in the Ministerial Ordinance under the provisions of Article 15-7 of the JAS Law.

Q67. In the case that we plan to sell organic *natto* (fermented soybeans) with its sauce and mustard attached, can we handle the *natto* with sauce and mustard as an

Organic Agricultural Product Processed Foods?

Ans. If organic *natto* with sauce and mustard attached (but not mixed with *natto*) is put on sale, those sauce and mustard are regarded as separate processed foods attached to organic *natto*. Therefore, if the *natto* itself is an Organic Agricultural Product Processed Foods, you may label it as “Organic *Natto*”.

Examples of labeling: Organic *Natto* (with mustard, sauce)

Organic *Natto* (with Organic Sauce)*

*In this case, “Organic Sauce” is necessary to have the Organic JAS Marks attached by the Certified Manufacturer.

IV. Sub-dividers

Q68. In the case that sub- dividing is carried out in the backyard of a supermarket, is it necessary to be certified as a Certified Sub-divider?

Ans. If you sub-divide Organic Agricultural Products in the backyard of a supermarket and attach Organic JAS Marks to the said Organic Agricultural Product (including the case that it is sold in cuts) or the packages and containers for it, you must be a Certified Sub-divider.

For your information, in the case that any product is sold in the following manner at the place provided as the organic agricultural product corner and other places where the measures are taken to prevent it from mixing with other agricultural products, you are not required to be a Certified Sub-divider since you do not attach Organic JAS Marks to your products.

- (1) To open the container box for an organic agricultural product and offer it for sale keeping them in the open box
- (2) To take an organic agricultural product out of the box and offer it for sale placing the Organic JAS Mark cut out of the said container box in close proximity to the agricultural product (including the cases that the organic agricultural product taken out is cut into halves, and that it is dished up for display)

Q69. In the case that we polish brown rice bearing Organic JAS Marks, subdivide it into bags bearing Organic JAS Marks and sell them, do we need the certification for a Certified Manufacturer or a Certified Sub-divider?

Ans. You are required to have the certification of Certified Sub-divider. For your

information, in the case that Organic JAS Marks are not attached on the bags (or the case that you polish the brown rice bearing organic JAS Marks, a consumer has designated at the shop front and sell the polished rice to the consumer), you do not need to be a Certified Sub-divider.

V. Importers

Q70. If a warehousing company is entrusted by Certified Importer with such works as storing of, and affixing the labels of grading to the imported agricultural products, is it necessary for the said warehousing company to be a Certified Importer?

Ans. The warehouse need not be certified as a Certified Importer. However, in such a case, the said Importer as an entrustor must be subjected to the examination for the certification of the importer including the warehouse as an undertaker and be certified as a Certified Importer.

Q71. If an imported agricultural product bearing the foreign word meaning “Organic” is not labeled as “Organic” in Japanese, isn’t it necessary to be a Certified Importer?

Ans. In the case that any of imported agricultural products is labeled as “Organic” or “ORGANIC” in English, those words are confusing with 「オーガニック」 or 「 (オーガニック)」 which are the examples shown in Article 5 of the Japanese Agricultural Standard for Organic Agricultural Products and Article 5 of the Japanese Agricultural Standard for Organic Agricultural Product Processed Foods. In such a case, the importer must obtain the certification as a Certified Importer and attach Organic JAS Marks to the product. The labeling in other foreign words that may possibly mislead the selection of merchandise by consumers giving the impression as if it were an “organic” product is handled in the same manner.

Note that, if an imported agricultural product without Organic JAS Marks is labeled as “organic” in Japanese, such a product cannot be sold as it is.

Q72. If an importer sells the product which was imported on or before March 31, 2001 as an organic food on and after April 1, 2001, is the importer required to attach Organic JAS Marks to the product?

Ans. If an importer sells (or transfers) organic foods on or after April 1, 2001, the said organic foods are necessary to bear Organic JAS Marks.

In this case, there are two alternatives; one is the method of importing and selling the agricultural products to which the Organic JAS Marks are attached by Certified Foreign Production Process Managers, and the other is that the said importer obtains the certification as an Certified Importer and attach Organic JAS Marks to the imported products based on the certificate issued by the government or the quasi-governmental organizations of the exporting country evidencing that the products are the organic foods under the system of the said exporting country.

VI. Japanese Agricultural Standards

Q73. What was the necessity to establish the Japanese Agricultural Standards for Organic Agricultural Products and Organic Agricultural Product Processed Foods this time?

Ans. As for the Organic Agricultural Products, the government has been promoting the proper labeling of them under the “Guidelines for the Labeling of Organic Agricultural Products and Specially Grown Agricultural Products”. However, there were seen improper labeling and confusions on the market, on which both consumers and producers have been raising loud cries for a clear definition and proper labeling.

As for Organic Agricultural Product Processed Foods, the distribution of processed foods indicating the use of Organic ingredients has been increasing in compliance with the consumers’ rising concern with health and safety. However, there have been found on the market such products as, though organically grown as far as the production of raw materials, are unclear whether they are handled organically (means the method provided under Article 2 of the Japanese Agricultural Standard for Organic Agricultural Product Processed Foods) in the subsequent processing stages, and their labeling may possibly give misconception to consumers.

Under the circumstances, a report was submitted by the Committee on the Inspection and Certification System of Organic Foods in November 1998, and, in reply to the report, the revision of the JAS Law was carried out in July 1999 incorporating the inspection and certification system for organic foods and the regulation of labeling. And also, based on the Guidelines for Organic Foods prepared by the Codex Alimentarius Commission in July 1999, the government formulated the special JAS Standards for Organic Agricultural Products and Organic Agricultural Product Processed Foods to make clear the definitions, production methods, and standards for labeling of Organic Agricultural Products and Organic Agricultural Product Processed Foods, thus ensuring the reliability of labeling and enabling the evaluation of values of Organic Agricultural Products and Organic Agricultural

Product Processed Foods.

1. Japanese Agricultural Standard for Organic Agricultural Products

(In relation to Article 2)

Q74. What is “natural circulation function of agriculture”?

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

Q75. What are the properties of soil?

Ans. The properties of soil can be classified into the following three categories:

Physical properties: Thickness, density, water permeability, air permeability, etc.
of cultivated soil

Chemical properties: Nutrient preservability, pH, oxidation-reduction potential, etc.

Biological properties: Biodegradability, etc.

Q76. What kind of place is “Collection field”?

Ans. It is a place such as forestlands, fields in fallow, levees and dry riverbeds other than fields.

Q77. What kinds of agricultural products are harvested in collection fields?

Ans. They are agricultural products growing spontaneously in natural areas, forestlands, etc, including raspberries, chestnuts and wild vegetables.

Q78. Why are those growing spontaneously included?

Ans. Those growing spontaneously are subject to drift of pesticides, while there are needs to distribute and consume those products which are verified not to have undergone the effect of drifting pesticides and differentiated as Organic Agricultural Products.

(In relation to Article 3)

Q79. To what kinds of agricultural products is the Japanese Agricultural Standard

for Organic Agricultural Products applied?

Ans. The said agricultural products includes those classified as the foodstuffs of agricultural origin in the Japan Standard Merchandise Classification prepared by the Management and Coordination Agency, such as rice, wheat and barley, miscellaneous grain crops, beans and peas, vegetables, fruit and other foodstuffs derived from agriculture, and blossoms (cherry blossom), leaves (leaves of cherry, persimmon and Magnolia hypoleuca) and seeds of trees, except as those processed.

Q80. Are the said standard applied to the mushrooms cultivated on bed logs and mushroom beds?

Ans. Those mushrooms cultivated on bed logs and mushroom beds are not covered by the said standard, since they are not the products utilizing the soil for their cultivation, and do not satisfy the requirements for the standards of production methods of Organic Agricultural Products. Therefore, they may not be labeled as organic.

Q81. Are water culture, rock wool culture and pot culture covered by the said standard?

Ans. The Japanese Agricultural Standard for Organic Agricultural Products provides that it is the principle of production of Organic Agricultural Products to bring the productive power derived from the properties of soil into full play. Therefore, agricultural products produced by water culture and rock wool culture are not covered by the said standard, and cannot be labeled as organic.

It is intended that Organic Agricultural Products be not produced until their production is carried out together with soil preparation. If you carry out the pot culture using the soil prepared in your own certified field and on the said certified field, the said standard may be applied to such pot culture.

Q82. Is the standard applied to *wasabi* (Japanese horseradish) grown by gravel culture?

Ans. Gravel-culture *wasabi* is grown with its roots fixed with stones and in the environment with the soil reduced to a possible minimum. It does not satisfy the requirement provided under the said standard, and therefore may not be labeled as organic. However, field *wasabi* and those harvested in collection fields may be covered by the said standard.

Q83. It seems that any agricultural product that is subjected to processing is not covered by the Japanese Agricultural Standard for Organic Agricultural Products. What degree of processing is regarded “processing” according to the standard? Is rice polishing included in the processing?

Ans. The judgment of whether processed or unprocessed is made considering the status of action taken on the said agricultural products in the light of the socially accepted idea. To take examples of agricultural products according to the concept of processing, heating, seasoning, grinding, extraction of juice and salting are thought to come under “processing”, while mere cutting and drying for transportation and storage are thought not to fall under processing. Cut and dried *daikon* (Japanese radish), dried persimmon, dried sweet potato fall under processing.

Rice polishing does not fall under processing, and polished rice is included in Organic Agricultural Products.

Q84. Is it necessary to be a Certified Manufacturer if crude tea is manufactured?

Ans. In many cases, tea leaves produced by farmers are immediately processed to crude tea to prevent them from discoloring with enzyme, so that Certified Production Process Managers are allowed to process and label them as organic. However, in the case that you do not produce tea leaves yourself but purchase them from farmers, manufacture crude tea and label them as organic, you are required to be a Certified Manufacturer.

(In relation to Article 4)

Q85. It is provided that “A field must be divided clearly to prevent it from the drifting of prohibited substances.” How is it judged concretely?

Ans. The onus is on the Registered Certification Organization to make a concrete judgment, which differs from field to field. The distance from the field where traditional farming is being done, division of the field by roads, etc., installation of wind-breaking net, arrangement of buffer zones by crop planting on the boundary, etc. will be the specified examples for the requirements.

Q86. If the field is situated within the area covered by aerial spraying, how should we address it?

Ans. You should ask the local implementation body conducting the aerial spraying to

exclude your field from the area to be aerially sprayed, and also take the measures to prevent the spray drift of pesticides.

Q87. How is the buffer zone in the area to be aerially sprayed checked?

Ans. Even though the said field is excluded out of the area to be aerially sprayed, aerial spraying is conducted in the circumference. Registered Certification Organization, therefore, make a judgment in view of whether an appropriate buffer zone is provided in terms of land form, wind direction, etc., and how aerial spray is conducted.

Q88. What is specifically meant by “Necessary measures shall be taken to prevent the prohibited substances from contaminating irrigation water.”?

Ans. If you use ① the water directly taken from a river, ② well water, ③ the water directly taken from a bog or pond, you need not take a measure to prevent the contamination of prohibited substances. If you use the water passing through the field where the traditional farming is being done, it is necessary to take the measures to prevent prohibited substances from flowing in the field where organic farming is carried out, such as storing the irrigation water temporarily in the clean paddy fields before the water enters the field where organic farming is carried out.

Q89. What are perennial crops?

Ans. Perennial crops are the ones that do not die after flowering and seeds setting, keep all or part of stocks alive and repeat the growth and flowering for long years, such as fruit trees, tea trees, asparagus, etc.

Q90. Is it allowable to apply other pesticides and fertilizers than cited in the Attached Table 1 before entering the conversion period?

Ans. It is allowed to apply the prohibited substances as the usual manuring practices before entering the conversion period. However, it should be avoided to apply a great deal of prohibited substances before the conversion period starts.

Q91. Why can “the newly developed field or the field which has not used for cultivation and on which any prohibited substance have not been applied for two or more years” be a condition for shortening the conversion period?

Ans. If any field has been in fallow for two or more years, during which period it is verified that any prohibited substance has not been applied on it, and thereafter the manuring practices are carried out for 12 months or more in accordance with the standard of production for Organic Agricultural Products, it will result that the field is regarded not to have used any prohibited substance for the aggregate three or more years.

Q92. Does the field exploited on the mountain one year before by applying weed killers meet the requirements for the shortening of conversion period?

Ans. If it is the fact that weed killers were applied one year ago, the conversion period cannot be shortened. In this case, it is necessary to fill the conversion period according to the principle.

Q93. If a field where Organic Agricultural Products are being grown is affected by spray drift originated in another field, how are the Organic Agricultural Products handled?

Ans. The effect given by spray drift differs depending upon the geographical conditions of the field, weather conditions of the area and so on. If it is confirmed that the field has been affected by spray drift of any pesticide other than cited in the Attached Table 2 of the Japanese Agricultural Standard for Organic Agricultural Products, the agricultural products in the said field are deemed not to be Organic Agricultural Products.

Q94. What is the “methods utilizing the functions of organisms”?

Ans. The activity of organisms in the soil (earthworms, insects and microorganisms) serves as a factor of fertility of soil. The said methods mean the decomposition of organic matters by those organisms and the improvement of properties of soil by metabolism of organisms.

Q95. What is “the case where the productive power of farmland originated in the properties of the soil cannot be sustained and enhanced solely by the method of utilizing the functions of organisms”?

Ans. It means the case that the normal growth of the said crop cannot be maintained due to the lack of nutrients for the crop.

Q96. What are “scion” and “rootstock”?

Ans. A scion is a bud to be grafted on the rootstock. A rootstock is the plant having a root in grafting.

Q97. What is “whole or part of the plant body”?

Ans. It means the stems and seed tubers of sweet potatoes and *satoimo* (taro), etc.

Q98. What is “the case of being hard to obtain them by ordinary means”?

Ans. Ordinary means of obtaining are purchase, transfer and exchange. The above case in question means the case that it is not available by those means. For your information, the case of remarkably high prices is also included depending on the degree.

Q99. What is the reason why the seeds and seedlings produced by genetic recombination technology are excluded?

Ans. It is based on the guidelines established by Codex Alimentarius Commission.

Q100. What are the cultural, physical and biological methods of control of harmful organisms?

Ans.

(1) Cultural method is to control harmful organisms by modifying the usual crop cultivation methods, such as:

① cultivation of resistant varieties, ② utilization of resistant rootstocks, ③ utilization of healthy seeds and seedlings, ④ mixed planting, crop rotation and paddy-upland rotation, ⑤ irrigation, ⑥ plowing and intertillage, ⑦ utilization of cover plants, and ⑧ adjustment of cropping season

(2) Physical method is to control harmful organisms using gravity, light, heat, sound and other physical properties, such as:

① selection of seeds by specific gravity, ② interception of light, ③ utilization of light traps and moth-proof lights, ④ utilization of plastic tapes, ⑤ hot water disinfection of seeds, ⑥ disinfection of soil by solar heat or steam, ⑦ utilization of sounds such as sound of explosion, ⑧ utilization of electricity, and ⑨ utilization of net

(3) Biological method is to control harmful organisms using the interactions between organisms, such as:

① utilization of antagonistic microorganisms, ② utilization of parasite / predator natural enemy, and ③ utilization of small animals

Q101.What is meant by “selection of kind of crop and variety”?

Ans. “Selection of kind of crop and variety” means to select the crops and varieties suitable for the soil and weather of the region and the crops and varieties resistant to harmful organisms, including the selection of crops and variety appropriate for rotation, mixed planting and paddy-upland rotation that are the means to prevent the soil fertility from lowering due to crop rotation control the infestation of harmful organisms.

Q102.What is meant by “adjustment of cropping season”?

Ans. “Adjustment of cropping seasons” means to shift the cropping season aiming at reducing the damage of harmful organisms by avoiding their most active time.

Q103.What is meant by “utilization of light”?

Ans. “Utilization of light” is the use of light traps and moth-proof light and the utilization of reflection by plastic tapes to control or reduce harmful organisms.

Q104.What is meant by “utilization of heat”?

Ans. “Utilization of heat” includes hot water disinfection of seeds, soil disinfection and weed killing by solar heat and steam.

Q105.What is meant by “utilization of sound”?

Ans. “Utilization of sound” means to avoid harmful organisms by sounds of explosion, etc.

Q106.What are the “mechanical methods”?

Ans. “Mechanical methods” mean the use of cultivating machines and mowers.

Q107.What are the “microorganisms inhibiting the proliferation of the microorganisms causing disease damage”?

Ans. “Microorganisms inhibiting the proliferation of the microorganisms causing disease damage” means such microorganisms as keep an appropriate balance of soil microorganisms, and activate them, and inhibit the proliferation of microorganisms causing disease damages as antagonistic organisms.

Q108.What are the “animals predating harmful organisms”?

Ans. “Animals predating harmful organisms” means such animals as inhibit the growth of harmful organisms by utilizing predator/parasite natural enemies, e.g. lady beetles predating plant lice, wild birds, frogs and wasps predating harmful insects, *aigamo* (a crossbreed of wild and domestic ducks), carps and crucian carps eating weeds, contributing to weeding.

Q109.What are the “plants repelling harmful organisms”?

Ans. “Plants repelling harmful organisms” means spice crops that repel harmful organisms with their smells, etc.

Q110.What are the “plants having the effect to inhibit the emergence of harmful organisms”?

Ans. “Plants having the effect to inhibit the emergence of harmful organisms” include antagonistic plants and cover plants that inhibit the emergence of harmful organisms, e.g. marigold, an antagonistic plant to eelworms, cover plants that inhibit the emergence of weeds (intercession of sunlight), etc.

Q111.What are “the cases that agricultural products are exposed to pressed or serious danger”?

Ans. They are the cases that harmful organisms are emerging, or are expected to emerge with a high probability from the past experiences, in the adjacent fields or within its field, and, if left untouched, it might give great damages on the said agricultural products.

Q112.Do the standards for management of transport, sorting, preparing, cleaning, storing, packaging and other processes cover the process till the products are delivered to consumers?

Ans. These standards cover the process until producers ship the products. Note that, during the process up to consumers it is necessary to prevent the products from mixing with the products produced by traditional farming or contaminating with prohibited substances, which is provided under the provisions of Article 19-7-2 of the JAS Law and Article 89 of the Enforcement Regulations of the JAS Law. If the products are mixed with

those produced by traditional farming, the label of grading (Organic JAS Marks) must be removed and erased.

Q113. What kind of chemicals can be used for cleaning the machines and tools used in the processes for management of transport, sorting, preparing, cleaning, storing, packaging and other processes?

Ans. Though cleaning agents for the machines and tools are not specified, it is necessary to take care not to contaminate Organic Agricultural Products by washing out the cleaning agent used.

Q114. Mulching substances are not cited as the substances applicable in the said standard. Is the use of the substances allowable?

Ans. Mulching substances can be employed, provided, however, that those impregnated with chemically synthesized substances cannot be used.

Q115. What is meant by keeping quality and improvement of quality?

Ans. Keeping quality is to keep the quality from degrading, for example, the freshness keeping technology employing nitrogen or carbon dioxide. Improvement of quality is exemplified by elimination of astringency of persimmon using ethanol.

(In relation to Attached Table 1)

Q116. What is the base for listing the Fertilizers and Soil Improvement Substances in Attached Table 1?

Ans. They are fundamentally based on those listed in the Codex's Guidelines as the permitted substances.

Q117. Is the use of composts derived from genetically modified crops allowable?

Ans. There is no stipulation to prohibit the use of composts derived from genetically modified crops.

It is because it is practically impossible to verify appropriately that each of composts from agricultural products and their residues, composts from excrements of livestock and poultry, composts from food industry, and composts from organic household refuse is not derived from genetically modified crops.

Q118.If rapeseed meal is the oil cake of rapeseeds after oil extraction with organic solvents, are such rapeseed meal and powdered rapeseed meal allowed to be used for composts?

Ans. Yes, it is, subject to no addition of chemically synthesized substance.

Q119.Is it not allowed to use any fertilizer or soil improvement substance not listed in Attached Table 1?

Ans. If its name of substance is not specifically cited in Attached Table 1, you are allowed to use such substances as conform to the standards set forth in the right column of “Other fertilizers and soil improvement substances” [Those (including organisms) applied to the soil with the aim of providing plants with nutrition or changing the properties of soil to serve to grow plants and those (including organisms) applied to plants with the aim of providing them with nutrition both of which are of natural origin or those derived from natural substances (limited to those produced by burning, calcining, melting, dry distilling or saponifying the natural substances and those produced from natural substances not by chemical method) and without chemically synthesized substances added].

(In relation to Attached Table 2)

Q120.What is the base for listing the pesticides in Attached Table 2?

Ans. Those cited in Attached Table 2 as usable for pest control are those registered under the Agricultural Chemicals Control Law or those not chemically synthesized and registered under the said law and included in those listed in the Codex’s Guidelines.

2. Japanese Agricultural Standard for Organic Agricultural Product Processed Foods

(In relation to Article 2)

Q121.Why are the processing methods limited to physical methods or the methods of utilizing the function of organisms?

Ans. Because it is proper to employ physical methods or the methods of utilizing the function of organisms for processing Organic Agricultural Products as ingredients to retain their properties during the process of manufacturing or processing.

The same way of thinking is taken in the Codex's Guidelines.

Q122. What are specifically the physical methods and the processing methods of utilizing the functions of organisms?

Ans. The physical methods include the mechanical methods and are such processing methods as grinding, mixing, forming, heating/cooling, pressurizing/release of pressure, drying, separation (filtration, centrifugation, pressing, distillation) and so forth.

The processing methods utilizing the functions of organisms include fermentation using molds, yeasts and bacteria, etc.

(In relation to Article 4)

Q123. Why are processing aids included?

Ans. In some cases, processing aids may cause foods to undergo chemical changes. According to the principles to retain the properties of Organic Agricultural Products as ingredients, it is necessary to limit processing aids to the usable products.

Q124. Do the provisos given in parentheses in of the column "Raw Materials", Items 1 and 2 of Article 4 of the Japanese Agricultural Standard for Organic Agricultural Product Processed Foods provide that it is required to carry out inspections for grading twice?

Ans. If you produce Organic Agricultural Products as ingredients and manufacture or process them into Organic Agricultural Product Processed Foods, you are required to carry out the grading of Organic Agricultural Products as ingredients with the certification under Article 15 of the JAS Law, and further carry out the grading of Organic Agricultural Product Processed Foods as final products.

However, in grading the Organic Agricultural Products as ingredients, you need not attach the label of grading to the Organic Agricultural Products.

Q125. How do you specifically identify "an agricultural product corresponding to the same kind of crop as an Organic Agricultural Product" and "an organic agricultural product processed food of the same category with an Organic Agricultural Product Processed Food"?

(e.g., black soybeans v. white soybeans, ordinary rice v. glutinous rice, tomato ketchup v. tomato puree)

Ans. It is basically thought that the products with the same general name are the same, though specifically required to judge individually.

When it comes to the above examples, “black soybeans” and “white soybeans” are the agricultural products relating to the same kind of crop, while “ordinary rice” and “glutinous rice” are not agricultural products relating to the same kind of crop.

“Tomato ketchup” and “tomato puree” are not the same kind of organic agricultural product processed foods.

Q126.What is specifically meant by “those obtained by genetic recombination technology”?

Ans. It means the crops obtained by genetic recombination and processed foods derived from them. The dairy products, meats and other products indirectly obtained from the livestock that have been raised with the feeds of those agricultural products obtained by genetic recombination technology are not included in “those obtained by genetic recombination technology”.

Q127.How can we confirm specifically whether it is a food exposed to ionizing radiation or not?

Ans. In Japan, irradiation is only allowed for the application of ionizing radiation on potatoes for prevention of germination. As far as the foods exposed to ionizing radiation are concerned, manufacturers are obligated to label them to that effect according to the provisions of the guidelines on labeling under the Food Sanitation Law. Therefore, you may confirm whether it is subjected to irradiation by the labeling of the product.

Q128.Is it allowed to use other food additives than cited in Attached Table 1 for the agricultural, livestock and marine products and their processed foods other than Organic Agricultural Products and Organic Agricultural Product Processed Foods?

Ans. The use of food additives is allowed for the agricultural, livestock and marine products and their processed foods other than Organic Agricultural Products and Organic Agricultural Product Processed Foods, but the food additives used must be “carryover”.

(note) Carryover means the substance that has been used for the manufacture or processing of the ingredient but is not used for the manufacture or processing of the said food and contained in the said food in a smaller quantity than the said substance exhibits its intended effect.

Q129. Is the provision “The weight percentage of other ingredients than Organic Agricultural Products and Organic Agricultural Product Processed Foods shall be no more than 5 % of the total ingredients.” based on the formulation of ingredients or the final product?

Ans. It is based on the formulation of ingredients.

Q130. If *natto* is made with full organic soybeans, can we call it “organic *natto*”?

Ans. To be “organic *natto*” as an Organic Agricultural Product Processed Foods, it is necessary to use organic soybeans with the label of grading as an ingredient and to employ the processing method of utilizing the physical methods and the method of utilizing the function of organisms, and not to use the other food additives than cited in Attached Table 1.

Q131. Why are the products containing not less than 70% of Organic Agricultural Products in the total ingredients not recognized?

Ans. In the Codex’s guidelines, all the ingredients of agricultural origin of the product should be organic agricultural products in principle, provided, however, that other ingredients may be used with the limit of maximum level of 5% of the total ingredients in the case where certain organic agricultural products or processed food derived from them are not available or in sufficient quantity, and that any government may consider to specify the products containing 70-95% of ingredients of organic origin only for those marketed in its territory.

In the recent revision of the JAS Law, it was provided that the ingredients other than organic foods may be used with the limit of 5% of the total ingredients according to the principle of Codex’s guidelines and in view of the status of industry and the consumers’ opinions.

Q132. The use of ionizing radiation for the control of harmful organisms is prohibited. Is it now allowed to use ionizing radiation for process control?

Ans. The use of ionizing radiation for the purpose of control of harmful organisms, preservation of foods, removal of pathogenic fungi or sanitation are prohibited, while it is allowable to use it for check of content, check of foreign matters, etc. as a tool for process control.

Q133. Is it allowed to use chemically synthesized sterilizers and cleaning agents for cleaning the agricultural products as ingredients of Organic Agricultural Product Processed Foods?

Ans. Since it is provided that processing aids shall be limited to those cited in Attached Table 1 as provided in the standards of raw materials under Article 4 of the Japanese Agricultural Standard for Organic Agricultural Product Processed Foods, you may not use those not cited in Attached Table 1.

Q134. May we use a sterilizer (sodium hypochlorite) to make well water potable for drinking?

Ans. The water used for the manufacture of foods must be potable for drinking as provided in the standards for Foods, Food Additives, etc. (Notification No. 370 of the Ministry of Health and Welfare, December 28, 1959).

It is allowable to use sodium hypochlorite for making water potable for drinking, but it is not allowed to use it during the process of manufacturing for other purpose.

Q135. Can we carry out the cleaning of machines and tools used in the processing processes?

Ans. It is allowable to clean machines and tools using cleaning agents, etc. Note that it is necessary to wash them well with water to ensure that the raw materials and products are not contaminated with the cleaning agents, etc.

Q136. How should the control of harmful organisms and small animals be carried out in the factory or the warehouse where raw materials and products are stored?

Ans. For the control of harmful organisms and small animals in factories and warehouses, you may take the physical methods such as physical protective fences, sonic waves, supersonic waves, light, ultraviolet ray, traps, temperature control, etc. or use any of the chemicals such as carbon dioxide, diatomaceous earth, etc. listed in Attached Table 2.

Note that you may not use other chemicals than those listed in Attached Table 2.

(In relation to Attached Table 1)

Q137. As the raw materials for the manufacture of a food additive, is it allowed to use those obtained by genetic recombination /technologies?

Ans. The raw materials obtained by genetic recombination technologies may not be used.

Q138. Is it not allowed to use any food additive not specifically cited in Attached Table 1?

Ans. If it is not specifically cited in Attached Table 1, you are allowed to use such materials as conform to all of the four standards set forth in the right column of “Other food additives”.

VII. Labeling

Q139. Is it allowed to label the agricultural products and processed foods not bearing Organic JAS Marks as “Organic Ingredients Used”?

Ans.

1. As for the labeling of agricultural products, any product is required to indicate the name (general name representing its profile) and the place of origin in accordance with the Quality Labeling Standard for Perishable Foods (Notification No. 514 of the Ministry of Agriculture, Forestry and Fisheries, March 31, 2000). If other claims are indicated, the agricultural products not bearing Organic JAS Marks are not allowed to bear such confusing claims as would give misconception as if it were an Organic Agricultural Product.

Note that it is allowable to indicate to the effect that the product is “grown with organic fertilizers” as well as the general name, which is not regarded as confusing labeling.

- (1) In the case of the product not bearing Organic JAS Marks, it is not allowed to indicate its claim as the following examples:

Organic / organic farming / full organic farming / full organic / foreign organic / semi-organic / organic rate: % / organically specially grown / organic & fresh from the farmer/ organic (Registered Trade Mark) / organic transitional farming / Organic farming with the shelter from rain / organic & no pesticide / no pesticide & organic / organic & low pesticide / low pesticide & organic / organic & reduced pesticide / reduced pesticide & organic / organic & minimum pesticide / minimum pesticide & organic / organic & complete no pesticide / organic farming with low pesticide / farming with organic soil / organic (in *katakana* letters) / organic (in English letters)

- (2) The following examples are allowed to indicate if not bearing Organic JAS Marks: Organic fertilizers used / organic fertilizers & reduced pesticide / tomatoes grown

with organic fertilizers

2. As for the labeling of processed foods, any product is required to indicate the product name and names of ingredients and others collectively in accordance with the Quality Labeling Standard for Processed Foods (Notification No. 513 of the Ministry of Agriculture, Forestry and Fisheries, March 31, 2000). If other claims are indicated, the agricultural products not bearing Organic JAS Marks are not allowed to bear such confusing claims as would give misconception as if it were an Organic Agricultural Product Processed Food.

Note that it is allowable to indicate to the effect that Organic Agricultural Products (limited to those bearing organic JAS Marks) are used as the ingredients for the product (In this case, if the percentage of Organic Agricultural Products as ingredients is not 100%, it is necessary to indicate the percentage of the Organic Agricultural Products in the total ingredients.)

- (1) In the case of the product not bearing Organic JAS Marks, it is not allowed to indicate its claim as the following examples:

Organic salad / organic vegetable sauce / organic tomato ketchup / organic certified ketchup / sauce fit for organic standard / organic pasta

- (2) The following examples are allowed to indicate if the product does not bear Organic JAS Marks but uses the ingredients bearing Organic JAS Marks:

Salad using organic vegetables / ketchup using organic tomatoes / *tofu* or soybean curds (organic soybeans % used)

(For reference)

The labeling of Specially Grown Agricultural Products (Cultivation with no pesticide, cultivation with no chemical fertilizer, cultivation with reduced pesticides and cultivation with reduced chemical fertilizers)(for the product name and description) under “the Guidelines for Labeling Concerning Organic Agricultural Products and Specially Grown Agricultural Products” is not subject to the regulations.

Q140.What kind of name is meant by a general name of agricultural product?

Ans. It is provided that the name (of product) to be labeled shall be a general name. The product name must be the one representing the profile of the product exactly and acceptable to the public.

Q141.Is it allowed to label “Organic & No Pesticide Tomato” as a product name?

Ans. If the product bears Organic JAS Marks (conforms to the Japanese Agricultural

Standard for Organic Agricultural Products) and in fact has been grown without pesticides, it may be labeled as “Organic & no pesticide”. So are the indications of “Organic & no chemical fertilizer” and “Organic & no pesticide/no chemical fertilizer).

Q142.Can we put the claim of “Organic Compost Used” on the agricultural products other than Organic Agricultural Products?

Ans. You may indicate it as the description of the product if the claim is the fact. However, if you emphasize the indication of the use of organic composts too much and give a misconception as if the agricultural product were produced by organic farming, it is likely to violate the labeling regulations.

Q143.Are the indications of “Organic Rice” and ”Organically Grown Rice” conforming to the Quality Labeling Standard for Brown Rice and Polished Rice?

Ans. The Japanese Agricultural Standard for Organic Agricultural Products provides that the names of Organic Agricultural Products should be labeled, for example, as “Rice (Organic Agricultural Product)”, “Organically Grown Rice”, “Rice (Organic)”, etc. Meanwhile, the Quality Labeling Standard for Brown Rice and Polished Rice provides that brown rice shall be labeled as “Brown Rice”, polished glutinous rice “Polished Glutinous Rice”, polished ordinary rice “Polished Ordinary Rice” or “Polished Rice”. Therefore, you may label as “Organic Polished Rice” or “Organic Ordinary Rice” in the column for the product name in the frame for collective labeling, and in the case that the product name is labeled out of the frame, you may label as “Organic Rice”, “Organically Grown Rice”, “Rice (Organic)”, or “Organic Polished Rice”.

Q144.Is it all right to label the Organic Agricultural Products by the name of product only?

Ans. The labeling of Organic Agricultural Products is required to refer to the place of origin according to the provisions of Article 3, Paragraph 1 of the Quality Labeling Standard for Perishable Foods (Notification No. 514 of the Ministry of Agriculture, Forestry and Fisheries, March 31, 2000) as well as the product name in accordance with the Methods of Labeling of Article 5 of the Japanese Agricultural Standard for Organic Agricultural Products.

Q145.Is it all right for the labeling of Organic Agricultural Product Processed Foods to refer to the names of product and raw materials only?

Ans. The indication of the product names of Organic Agricultural Product Processed Foods should follow any of the examples cited in the said standard regardless of the provisions of Article 3, Paragraph 1, Item 1 of the Quality Labeling Standard for Processed Foods (Notification No. 513 of the Ministry of Agriculture, Forestry and Fisheries, March 31, 2000).

As far as the labeling of ingredients of Organic Agricultural Product Processed Foods is concerned, Organic Agricultural Products should be labeled as “Organic _____”, and Organic Agricultural Products in Conversion as “Organic _____ in Conversion”, where _____ is entered by the general name of agricultural product or organic agricultural product processed food in accordance with Article 3, Paragraph 1, Item 2 of the Quality Labeling Standard of Processed Food.

The labeling of Organic Agricultural Product Processed Foods is also required to refer to the net content, date of “Best Before” (minimum durability), instruction for storage, name or trade name and address of manufacturer, etc. other than the names of product and ingredients.

Q146. Is the labeling “Organic Ham” and “Organic Sausage” allowable?

Ans. Since livestock products are not covered by the agricultural and forestry products for which the Japanese Agricultural Standards have been established as referred to in Article 19-10 of the JAS Law, the labeling of “organic” for livestock products is also not covered by the labeling regulations.

Q147. Is it allowed to label the processed product containing 50-95% of Organic Agricultural Products as “organic”?

Ans. The product is not allowed to label “organic” under the Japanese Agricultural Standard for Organic Agricultural Product Processed Foods, but it is possible to label its claim of “organic” under Article 5 of the Quality Labeling Standard for Processed Foods subject to the labeling of the percentage of Organic Agricultural Products together with the said claim.

Q148. In what manner is the monitoring of Organic Agricultural Products, etc. being carried out?

Ans. Center for Quality Control and Consumers Service is carrying out the daily monitoring of Organic Agricultural Products, etc. on the market at its eight local centers located across Japan.

Q149. Is the labeling regulations of organic foods applied to food service industry and home meal replacement industry?

Ans. The labeling regulation concerning organic foods is applied to food service industry and home meal replacement industry as well.

Note that fliers, menus, banners, etc. are not covered by the said regulation since they are regarded as the tools to furnish information to consumers. In this case, however, it does not abate the application of the Food Sanitation Law or the Law for Preventing Unjustifiable Gifts and Misleading Representation.

Q150. We are planning to sell agricultural products grown in accordance with the Japanese Agricultural Standard by the tie-up of producer and consumers. Is it necessary for us to be certified as a Certified Production Process Manager?

Ans. Even though agricultural products produced in accordance with the Japanese Agricultural Standard are sold with the labeling of “organic” by a producer-consumer tie-up, the producer is required to be a Certified Production Process Manager.

As the producer-consumer tie-up is the type of sales system which is based on the special relationship of mutual trust, there would be the disclosure and exchange of enough information concerning their production in advance of, or at the time of, purchasing the products. In such a case, the condition of the production of the merchandise (agricultural products) (for example, they have been produced according to the Japanese Agricultural Standard for Organic Agricultural Products) would have already been disclosed in a wide range, and it would be hardly necessary to label those products as “organic”. Therefore, it is not thought that the regulations on those products would cause inconvenience to the producer.

Note that anything except the merchandise, its packages and containers, and invoices, such as leaflets describing the merchandise and order sheets, are not covered by the labeling regulations.

1. Labeling covered by the regulations
 - (1) Seals bearing the organic labeling attached on the specified agricultural and forestry products
 - (2) Organic labeling on the containers and packages containing the specified agricultural and forestry products and their invoices (meaning a statement of delivery, commercial invoice, etc. issued together with the merchandise; the same applies hereinafter)

- (3) Organic labeling on the signboard indicating that the displayed specified agricultural and forestry product is organic
2. Information supply not covered by the regulations
 - (1) Mentions on newspapers, magazines, the Internet and other media informing that the informer is dealing with Organic Agricultural Products (including the explanations to the effect that the specified agricultural and forestry product on the photos or illustrations put up there is organic)
 - (2) The same kind of mentions appearing on fliers, leaflets, newsletters and signboards
 - (3) Mentions as to which is “organic” appearing on the fliers inviting orders for the merchandise to be supplied next week (including photos and illustrations)
 - (4) Mentions as to which is “organic” appearing on the order sheets
 - (5) Newsletters or similar documents put in the vegetable boxes that are delivered after selected by the customers identifying which merchandise is “organic”

Q151.If Organic Agricultural Products and Organic Agricultural Products in Conversion are mixed up, how should it be indicated?

Ans. In such a case, mention should be made as “ in Conversion”.

Likewise, if any of Organic Agricultural Products in Conversion and Organic Agricultural Product Processed Foods in Conversion is used as an ingredient for an Organic Agricultural Product Processed Food, mentions of the names should be made as “Organic in Conversion” or “Organic (in Conversion)”.

VIII. Miscellaneous

Q152.How is the “Guidelines on the Labeling concerning Organic Agricultural Products and Specially Grown Agricultural Products” handled?

Ans. Since the labeling regulations on Organic Agricultural Products under the JAS Law will start on April 1, 2001, the part concerning Organic Agricultural Products in the said guidelines is to be deleted on April 1, 2001, while the provisions concerning the remaining “Specially Grown Agricultural Products” will survive.

Q153.What kind of organizations can we contact to inquire or consult on the inspection and certification system for organic foods?

Ans. Your nearest Center for Quality Control and Consumers Service is ready for your

inquiries and consultation. The contacts are as follows:

Otaru Center for Quality Control and Consumers Service (Otaru City):	TEL:	0134-33-5969
Sendai Center for Quality Control and Consumers Service (Sendai City):	TEL:	022-293-3931
Tokyo Center for Quality Control and Consumers Service (Omiya City):	TEL:	048-600-2350
Yokohama Center for Quality Control and Consumers Service (Yokohama City):	TEL:	045-201-7431
Nagoya Center for Quality Control and Consumers Service (Nagoya City):	TEL:	052-232-2029
Kobe Center for Quality Control and Consumers Service (Kobe City):	TEL:	078-331-7661
Okayama Center for Quality Control and Consumers Service (Okayama City):	TEL:	086-222-6926
Moji Center for Quality Control and Consumers Service (Kitakyushu City):	TEL:	093-321-2661

Your nearest Corporate Distribution Division, Production & Distribution Department, Regional Agricultural Administration Office, or Farmland Policy Planning Division, Agricultural and Forestry Department, Okinawa General Bureau, Food Labeling Office, General Food Policy Bureau, the Ministry of Agriculture, Forestry and Fisheries, and Consumers' Room of the Ministry of Agriculture, Forestry and Fisheries are ready for your contact.