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

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I. Registered certifying body

1. What is a registered certifying body?

(Q1) Are there any registration classifications for registered certifying bodies?

(A) Article 40 of the Enforcement Regulations for the Law Concerning Standardization and Proper Labeling of Agricultural and Forestry Products (hereinafter “the Ministerial Ordinance”) provides 5 types for registration, among which organic foods are aggregated as “jidori-niku (naturally grown chicken), organic plants, organic processed foods, organic feeds and organic livestock products.” If an applicant applies for only organic foods, the applicant is able to specify the type(s) of organic products subject to certification at registration, such as “organic plants,” “organic plants and organic processed foods,” “organic feeds and organic livestock products” and etc. The same application fee is applied for all cases.

2. An applicant is also able to specify product items in its application, such as “rice,” while the applicant applies for “organic plants” as the registration classification.

(Q2) Are local governments such as prefectures able to apply for registered certifying bodies?

(A) Local governments such as prefectures are public corporations under article 2, paragraph 1 of the Local Autonomy Law. They are able to be registered as registered certifying bodies if they satisfy the requirements specified by the JAS Law. They shall submit applications provided by article 55 of the JAS Law to the Minister of Agriculture, Forestry and Fisheries in the same manner with private corporations.

(Q3) Are registered certifying bodies able to have their own standards besides technical criteria for certification regarding “organic” and conduct certification activities based on their own standard?

(A) 1. Registered certifying bodies certify operators based on “the technical criteria for certifying production process managers of organic plants” (hereinafter, “the technical criteria for certification”). Registered certifying bodies are also able to establish their own standards and certify operators based on their standards. In this case, the registered certifying bodies may certify based on their own standards which include additional requirements other than those in the technical criteria for certification. Please note that certification under the JAS Law shall satisfy each requirement of the technical criteria for certification. Certification based on the own standards different from the technical criteria does not itself substitute for certification under the JAS Law.
2. The registered certifying bodies are able to certify based on both the technical criteria for certification and their own standards at the same time.

(Q4) If a certifying body consisting only of its members is registered, is it able to certify only its members? Is it also able to force certifications in accordance with its own standard?

(A)

All registered certifying bodies should conduct inspections for certification to everybody irrespective of its membership upon requests, unless there are any justifiable reasons. They should also conduct certification services in a fair manner in accordance with the criteria provided by the Law and Ordinances on the JAS, then should not force certifications based on its own standards.

(Q5) Are registered certifying bodies able to provide consulting services to applicants for certification?

(A)

1. Registered certifying bodies should not provide certification applicants with any consulting services such as advising specific measures, methods or strategies for improvement in order to solve problems for certification. Please note that consulting services do not include:

   - Providing general information such as on inspection and certification system, Japanese Agricultural Standards, technical criteria for certification application methods and certification fees; and

   - Pointing out items not in compliance with the technical criteria and a necessity of improvement to the applicant at the on-site inspection without mentioning specific methods to cope with.

2. For further information, please contact the Incorporated Administrative Agency Food and Agricultural Materials Inspection Center (hereafter “the FAMIC”).

(Q6) Are registered Japanese or overseas certifying bodies able to certify production process managers working in other than the countries in which their offices are located?

(A)

Registered Japanese or overseas certifying bodies are able to certify overseas production process managers by conducting on-site inspections in overseas countries, provided that they shall specify the mentioned overseas countries in the “area and
location of office where the certification business is carried out” at the registrations. The certifying bodies should also periodically conduct on-site inspections of the certified operators after the certification.

(Q7) Are executive officers of a registered certifying body able to consist of only “producers to be certified” or “certified producers”?

(A)

Certified operators such as “producers to be certified” or “certified producers” are able to become executive officers of a registered certifying body. However, executive officers and regular employees of one certified operator shall not exceed half of executive officers of a registered certifying body nor become managing directors representing the registered certifying body, in order to comply with the registration criteria. The managing directors shall not be involved with certifying the organizations which they belong to.

2. Certification services

(Q8) How do applicants receive the decisions of certification?

(A)

1. When a registered certifying body decides to certify an applicant, the head of the registered certifying body issues a certification containing the following matters:

   (a) Type of plant and forestry products relating to the certification;
   (b) Name and location of factories, fields or places of business relating to the certification;
   (c) Certification number;
   (d) Certification date; and
   (e) Name and address of the certified production process manager.

2. When a registered certifying body decides not to certify an applicant, the head of the registered certifying body notifies the applicant of that mention with reasons.

(Q9) What is “the seminar designated by the registered certifying bodies” in the technical criteria for certification?

(A)

“Seminar designated by the registered certifying bodies” include those held by the
registered certifying bodies by themselves and other organizations such as Japanese Agricultural Standards Association.

(Q10) For what purposes do registered certifying bodies hold seminars?

(A)

1. Registered certifying bodies shall inform the contents of the JAS Law and the objectives and structures of the inspection and certification system of organic foods under the JAS Law so that certified operators are able to properly conduct grading. Therefore, registered certifying bodies shall inform their operators about the following matters: (a) the Law and Ordinances on the JAS; (b) the inspection and certification system of organic foods; (c) the Japanese Agricultural Standards regarding “organic”; (d) the technical criteria for certification; and (e) general procedures for certification.

2. To be specific, registered certifying bodies shall also inform about the following matters depending on the registration types.

   a) For production process manager for organic processed foods and organic feed (limited to those prepared and selected; hereinafter the same in a))

      i) In the management and control process of the production process of organic processed foods and organic feeds

         - Matters related to receiving and storage of ingredients, the mixture rate of ingredients, methods of manufacturing and processing, and machines and tools used for manufacturing and processing.

      ii) In the grading process of organic processed foods and organic feeds

         - Matters related to the inspection of the production process, grading labeling, shipment or disposition of lots after grading and making and keeping the record.

   b) For production process manager for organic plants and organic feeds (limited to those prepared and selected; hereinafter the same in (2))

      i) In the management and control process of organic plants and organic feeds

         - Matters related to obtaining seedlings and materials, the manuring practice, the control of noxious animals and plants, general management, management for raising seedling and harvest, transportation, selection, processing, cleaning, storage, packaging, and other post-harvest processes.

      ii) In the grading process for organic plants and organic feeds
- Matters related to inspection of production process, grading labeling, shipment or disposition of lots after graded and making and keeping the record.

c) For production process manager for organic livestock products

i) In the management and control for organic livestock products

- Matters related to obtaining livestock and materials, providing feeds, health management, general management and management of slaughter, selection, processing, cleaning, storage, packaging, and other processes.

ii) In the grading process for organic livestock products

- Matters related to inspection of production process, grading labeling, shipment or disposition of graded lots and making and keeping records.

d) For re-packers

i) In the re-packing process

- Matters related to receiving and storage of the organic graded products, confirmation of the grading label before re-packing, method of re-packing and machines and tools used for re-packing.

ii) In the labeling grading process

- Matters related to grading labeling, shipment or disposition of lots, and making and keeping records.

e) For importers of organic plants and organic processed foods of plant origin

i) In the receiving and storage process of imports

- Matters related to receiving and storage of organic plants and organic processed foods of plant origin.

ii) In the labeling grading process

- Matters related to grading label, shipment or disposition of lots, and making and keeping records.

(Q11) May a close relationship with a registered certifying body and certification applicants developed in seminars held by the registered certifying body cause obstacles for its neutral certification services?

(A)
Seminars are intended for ensuring the credibility of the certification and inspection system by disseminating the objective and system of organic certification under the JAS system. Seminars do not cause obstacles for neutral certifications.

(Q12) How frequent do registered certifying bodies audit certified production process managers?

(A)

Registered certifying bodies shall inspect certified operators no less than once a year to confirm that they meet technical criteria for certification, and properly conduct grading and labeling grading, within one year from the certification dates or the last inspections. Registered certifying bodies conduct ad-hoc inspections if deemed necessary.

3. Certification service workers

(Q13) What is “guidance, survey, or research concerning agricultural production” of the qualifications of certification service workers?

(A)

1. “The guidance concerning agricultural production” includes:
   
   (a) Technical guidance concerning the cultivation conducted by farming advisors and agricultural extension advisors;
   
   (b) Guidance by “persons in charge of confirmation” provided by “The Guidelines for Labeling Specially Grown Plant Products” by the Ministry of Agriculture, Forestry and Fisheries; and
   
   (c) Guidance by persons qualified for the agricultural sector among the techniques covered by “the Law for Consultant Engineers.”

2. “The survey or research concerning agricultural production” includes survey of the growth condition, research concerning agricultural production, and inspection and certification services of organic plants, conducted by seed and seedling companies, fertilizer companies, agricultural chemical companies and public or private research institutes.

(Q14) What is “manufacturing or processing drinks and foods, or related guidance, survey or research” among the qualifications of certification workers?

(A)
“Manufacturing or processing drinks and foods” includes:

(a) Manufacturing, processing, quality management, product development, survey and research in foods manufacturing companies;

(b) Guidance conducted by persons qualified for the agricultural sector among techniques covered by “The Law for Consultant Engineers”;

(c) Research concerning manufacturing and processing of drinks and foods by public or private research institutions; and

(d) Inspection and certification services of organic processed foods of plant origin.

(Q15) Who are qualified for “persons with equivalent qualifications with items 1 to 3” among the qualifications of certification service workers?

(A)

They include persons with expertise in agriculture, foods and drinks with the status of no less than the assistant examiner certified by The Japan Accreditation Board for Conformity Assessment (JAB) and persons qualified for the examiners of organic foods certified by organizations with an international credibility, such as those certified by the International Organic Accreditation Service Inc. (IOAS*) or with in compliance with the ISO Guide 65. For more detailed information, please contact the FAMIC.

(*) IOAS is a certifying body which conducts certification in accordance with the criteria by the International Forum of Organic Agriculture Movement (IFOAM).

(Q16) Is a head of a registered certifying body able to concurrently serve as an inspector or a referee?

(A)

Heads of registered certifying bodies are able to concurrently serve as inspectors or referees. They should inspect or judge in a fair manner, without exercising theirs influences as heads in certification or judgment services.

4. Supervision of registered certifying body

(Q17) How are registered certifying bodies audited?
The FAMIC officials audit registered certifying bodies no less than once a year to confirm they properly conduct certification services in accordance with the business operating rules. The FAMIC informs registered certifying bodies about the dates and the audit contents in advance. The registered certifying bodies shall provide the FAMIC with the records of inspection reports on certification services, related rules, the budget and settlement of revenues and expenditures at the audits.

(Q18) Are unannounced audits necessary for fields and factories of certified production process managers?

(A)

Registered certifying bodies shall inspect the certified production process managers no less than once a year and may conduct unannounced inspections if deemed necessary.

(Q19) Shall the central government audit local governments?

(A)

The central government shall audit local governments which are registered as certifying bodies in order to ensure proper certification services.
II. Production process manager for organic plants

(Q20) What services do certified production process managers conduct?

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

(Q21) Is a certification in each necessary for a field for three or four crops?

(A) The certification is valid regardless of the number of crops a year, once the field is certified.

(Q22) Is there any effective period for certified fields?

(A) An effective period for certified fields is not provided. Registered certifying bodies have to inspect the certified fields no less than once a year after certification to confirm that they comply with the criteria of “the conditions of field” provided by the Organic JAS.

The Minister of Agriculture, Forestry and Fisheries cancels the certification of the field in any of the following cases:

a) certified operator does not remove or erase an inappropriate grading label; attaches an inappropriate grading label or any misleading label with the grading label; or violates the provisions on the reuse of packaging materials, when he or she alienates or displays plant and forestry products with the grading label attached beforehand;
b) certified operator fails to comply with the technical criteria for certification;
c) certified operator violates an order by the Minister or Agriculture, Forestry and Fisheries to improve, remove or erase the grading label under the article 19-2;
d) certified operator fails to comply with a request by the Minister of Agriculture, Forestry and Fisheries to report under article 20-2; makes a false report; or refuses, impedes or avoids an inspection by officials of the Ministry of Agriculture, Forestry and Fisheries under the same article; and

e) certified operator has been certified by improper means.
(Q23) Are production process managers able to conduct grading as well?

(A)

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

(Q24) Please provide the calculation basis for the necessary number of production process managers who are able to manage or control, depending on the number of fields and the degree of scattering of fields.

(A)

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

(Q25) How is a management record of a production process confirmed to be of the relevant production lot?

(A)

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

(Q26) Is it able to attach the Organic JAS logo to plants harvested or cultivated before production process managers are certified?

(A)

1. Registered certifying bodies are able to certify production process managers even during the period of cultivation or after harvest of plant products. In this case, the registered certifying bodies shall inspect the production management system based on “the technical criteria for certification of production process managers for organic plants,” including the criteria concerning the methods of production such as field conditions, in the same manner with regular certifications. If plant products have been cultivated or have already been harvested, the whole production process management system shall be inspected, including whether or not those plant products comply with the Organic JAS, by the production process management records and storage conditions.
2. The certified production process managers are able to grade and attach the Organic JAS logo to the plants held in storage after harvest or during cultivation at the time of certification, based on the Organic JAS system.

(Q27) Please inform the contact point where production process managers-to-be who wish to produce organic products are able to ask the method and procedure.

(A)

1. Those who wish to be certified as production process managers have to provide a registered certifying body with the records to prove that the fields have been complying with the criteria of the “manuring practice in fields,” “seeds or seedlings to be sown or planted in field,” “control of noxious animals and plants in fields,” “general management” and “management of raising seedlings” in article 4 of the JAS for organic plants for no less than one year. Therefore, they have to keep those records in order to start organic production.

2. For the procedures of certification, the content of certification criteria and the forms of the records, please contact with registered certifying bodies. For their locations, please refer to the websites of the Ministry of Agriculture, Forestry and Fisheries and the FAMIC.

III. Production process manager of organic processed foods

(Q28) Is a certification as a production process manager necessary to make vegetable salad using organic vegetables in a supermarket and attach the Organic JAS logo to them?

(A)

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

(Q29) When farmers process organic plants produced by themselves and sell them, shall they be certified as production process managers of organic processed foods as well as production process managers of organic plants?

(A)
They should be certified as production process managers of organic processed foods.

(Q30) Should the same one person manage the production process? If the production process management is shared by a few persons, should all of them be certified as operators?

(A)

1. The production process should not be always managed by the same one person. There are two ways to manage as below:

   a) All persons who manage the production process of organic plants compose a group and are certified as a production process manager as the group such as:

      i) Farmers and rice polishing facilities; and

      ii) Manufacturing factories and packaging factories.

   “Names and addresses” of all members shall be specified in the certification application in accordance with article 32, item 1 of the Ministerial Ordinance.

   b) Farmers of organic plants or manufacturers of organic processed foods are certified as production process managers and manage a part of the production process by themselves and subcontract the other part of production process to others. Certified farmers or manufactures shall attach the Organic JAS logo to the products.

2. While farmers and manufactures are certified by each field or office, the production process is managed at the responsibility of the production process managers, irrespective of the methods of management. Therefore, all fields or offices involved in the production process shall be specified at the certification as the filed or offices which the certified operators should manage or control the production process. In applications for certification, all the fields and offices involved in the production processes shall be specified in the “name and location of fields or places of business where the mentioned plant and forestry products are produced” in accordance with article 28, item 3 in the Ministerial Ordinance. Any amendments made to fields or offices involved in the production process are to be notified the registered certifying body to make changes to the certification.

(Q31) Should certified overseas production process managers of organic processed foods procure ingredients with the Organic JAS logo to produce and sell organic processed foods?
(A)

1. The Ministerial Ordinance provides countries whose systems are equivalent with the JAS system under article 15-2 of the JAS Law. Organic plants and organic processed foods of plant origin which were produced and certified in those countries are equivalent with the those certified by the Organic JAS in terms of production criteria and distribution treatment, to which certified importers are able to attach the Organic JAS logo after imported to Japan.

2. Certified overseas production process managers of organic processed foods in those equivalent countries which are provided by the Ministerial Ordinance are able to procure ingredients certified as organic plants or organic processed foods of plant origin in the grading systems of those countries and manufacture or process organic processed foods.

(Q32) If organic \textit{natto} (fermented soybeans) is sold with sauce and mustard, should sauce and mustard as well as \textit{natto} regarded as organic processed foods?

\textbf{(A)}

When organic \textit{natto} is sold with sauce and mustard, but without mixed together, the sauce and mustard are regarded as other processed foods attached to the organic \textit{natto}. In other words, if \textit{natto} itself is an organic processed food, it is able to carry a label as “organic \textit{natto}.” Labeling examples include:

\begin{itemize}
  \item[a)] Organic \textit{natto} (with mustard and sauce) \textsuperscript{Note 1}
  \item[b)] Organic \textit{natto} (with organic sauce) \textsuperscript{Note 2}
\end{itemize}

\textbf{Note 1:} a) is applied when both mustard and sauce are not organic foods.

\textbf{Note 2:} b) is applied on the condition that certified operators shall attach the Organic JAS logo to the “organic sauce.”

\textbf{IV. Re-Packers}

(Q33) Who should be certified as re-packers?

\textbf{(A)}

1. Re-packing generally means “further dividing products into smaller units” in other words, changing their shapes smaller by cutting or sorting. It also includes changing the products distributed in smaller to bigger units by pulling them together in boxes or bags.
2. The JAS provides that certified re-packer are those who reattach the Organic JAS logo to re-packed products at levels such as wholesale, brokerage or retail.

3. Please note that certified re-packer shall not mix a number of kinds of foods and re-packed them. Mixing is regarded as a processing because a new characteristic is added to the products. Certified re-packer are able to re-pack organic vegetable sets, because consumers will separately consume mixed foods and characteristics of vegetables are maintained.

4. Certified re-packer are able to mix and re-pack the same kind of processed foods, because no new property is added to the products.

(Q34) Is a certification necessary for re-packing foods in a supermarket?

(A)

Two cases are considered below:

- Case 1: certification as re-packer is not necessary;

  A certification for re-packer is not necessary for re-packing organic plants in a supermarket backyard and posting the Organic JAS logo cut off from the empty box close to re-packed plants, if the identities of organic plants and the attached Organic JAS logo are ensured by setting up a corner for organic plants and preventing them from mixing with other plant products. This Case 1 includes: a) piling up the organic plants taken out of from boxes; b) putting them in dishes; c) packing them in bags or containers; d) selling them in pieces; and e) wrapping cut foods.

  Please note that labeling as “organic” on the containers or the package of re-packed plant products is prohibited. Labeling as “organic” should be always identified with the organic JAS logo. Please label as “organic” in places close to the posted Organic JAS logo by pop-ups, if not certified as re-packer.

- Case 2: certification as re-packer is necessary;

  A certification as re-packer is necessary if the term “organic” is labeled to containers or packages of re-packed plant products including those prepared and cut for sale. This is because the Organic JAS logo should be newly attached to the products.

(Q35) Is a certification as production process manager or re-packer of organic processed foods necessary for polishing brown rice with the Organic JAS logo or mixing a few kinds of organic rice and attaching the Organic JAS logo to the products?
A certification as re-packers is necessary because grading labels are to be re-labeled. Please note that a certification as re-packer is not necessary when the Organic JAS logo is not re-attached on re-packed bags. The latter includes a case when brown rice with Organic JAS logo is polished and sold to consumers face-to-face.

(Q36) Are importers or re-packers able to consign: storing imports or products to be re-packed; re-packing; and attaching grading labels to warehousers?

(A)

Uncertified warehousers should not be consigned for attaching grading labels, because certified operators should attach grading labels. Importers or re-packers should apply for certification together with warehousers and be certified as certified importers or re-packers, if warehousers store, re-pack and attach grading labels. Please note that a group name should appear together with names of importers or re-packers and warehousers in “name and address” of an certification application in accordance with articles 32-1 and 34-1 of the Ministerial Ordinance.

(Q37) Should be importers certified when they do not label as organic in Japanese to the imports labeled as organic in a foreign language?

(A)

Certified importers should attach the Organic JAS logo to the imports labeled as organic in English, because those labels are confusing with “organic XX” or “XX (organic)” provided by articles 5 of the JAS for organic plants and organic processed foods. The same rule applies to any confusing label in other languages by which consumers are misled. Imports without the Organic JAS logo should not be labeled as “organic” in Japanese and sold in the Japanese market.

V. Importers

(Q38) Are organic foods, produced in country B in accordance with the system of country A and imported via country A, able to carry the Organic JAS logo with the certification of country A? The system of country A is approved as equivalent with the Organic JAS system, while that of country B is not.

(A)
1. Certified importers are able to import organic plants and organic processed foods of plant origin which were graded under the overseas systems and attach the Organic JAS logos to the products if the following 3 conditions are satisfied:
   a) Japan approved the system of exporting countries of the organic products as equivalent with the Organic JAS system;
   b) the products are produced and graded in those equivalent countries; and
   c) the certificates issued by the governmental organizations of the equivalent countries or their copies are attached to the products.

2. Certified importers are not able to attach the Organic JAS logo to organic products made in country B, because country B is not approved to have an equivalent system.

VI. Japanese Agricultural Standards

(Q39) What does the organic regulation provide for labeling?

(A)

1. The regulation prohibits labeling of “organic plants,” “organic processed foods of plant origin” or any misleading labeling, when the Organic JAS logo is not attached by certified operators.

2. Imported products labeled as organic or with any misleading label shall not be sold, entrusted for sale, or displayed as organic plants nor organic processed foods without the Organic JAS logo.

(Q40) How are “countries whose systems are equivalent to the grading system under the Japanese Agricultural Standards” in article 15-2-2 of the LAS Law decided and made to the public?

(A)

The Ministry of Agriculture, Forestry and Fisheries is responsible for equivalency evaluations upon requests from interested countries and notifications by the Ministerial Ordinances on a case-by-case basis. Names of equivalent countries are also available at the websites of the Ministry of Agriculture, Forestry and Fisheries.

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

(Q41) What “natural circulation function of agriculture”?

(A)

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

(Q42) What kind of plant products are harvested in collection areas?

(A)

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

(Q43) Why are naturally grown products subject to the Organic JAS?

(A)

There are demands for distribution and consumption of those which are not affected by agricultural chemicals and differentiated as organic, while naturally grown products may be affected by agricultural chemicals.

(Regarding Article 3)

(Q44) What are specific examples of “other materials that are applied to plants and soils” as “prohibited substances”?

(A)

1. The revision of the Organic JAS of 2005 included “other materials that are applied to plants and soils” to prohibited substances in addition to fertilizers or agricultural chemicals (except those derived form natural sources, or natural sources without the use of chemical treatment).

2. The use of materials with chemosynthetic substances that might contaminate organic plants or organic fields has been prohibited under the previous Organic JAS.
The revision of 2005 clarified this regard in order to thoroughly notify certified operators and others.

3. “Other materials that are applied to plants and soils” include mulches intended to be plowed into soils and pollen extenders which are directly applied to plants. Prohibited substances do not include plastic mulches which are removed after used, vinyl for plastic greenhouses, poles and nets. The previous management is permitted for one year after the enforcement of the revised standard until November 25th, 2006 as an interim measure.

(Q45) Does the JAS for organic plants cover plant products cultivated by hydroponic, rockwool and pot cultures?

(A)

Plant products cultivated by hydroponic and rockwool cultures do not comply with the Organic JAS, because the Organic JAS provides the production principle as “exercising the farmland productivity derived from original soils.” Those products accordingly shall not carry the Organic JAS logo nor be labeled as organic plants by pot culture comply with the Organic JAS, if the soil of a certified field is used and the product is cultivated in the certified field.

(Q46) Does the Organic JAS cover wasabi cultivated in gravels?

(A)

Wasabis cultivated in gravels, whose roots are fixed as far as possible by stones and without soil, are not organic plants, because they do not meet the organic production principle of “exercising the farmland productivity derived from original soils.” Those wasabis shall not carry the Organic JAS logo nor be labeled as organic. Wasabis harvested in fields are subject to the Organic JAS.

(Q47) The JAS for organic plants does not apply to manufactured or processed plant products. What are the coverages of manufacturing and processing? Does processing cover polishing rice?

(A)

The judgment of manufacturing or processing is done based on conventional norms, taking into account treatments of plant products. While “manufacturing” means creating something new and different in nature from the used ingredients,
“processing” means adding a new characteristic to the ingredients without changing their nature. Processing examples include heating, flavoring, grinding, squeezing juice and salting, but do not include simple cutting, transporting and drying products for storage. Please note that dried strips of radish, dried persimmons, dried sweet potatoes and herbal tea (dried herb) are considered as processed foods, while polished rice is subject to the JAS for organic plants.

(Q48) Is a certification as production process manager of organic processed foods necessary for grading dried green tea or rice bran?

(A)

1. Production process managers of organic plants are able to label dried green tea leaves as organic in accordance with the JAS for organic plants. Tea leaves have to be prepared into dried tea leaves by heating immediately after harvest for the purpose of preventing their color changes. Because of its necessity, heating is considered as a preparing process of tea leaves. Please note that a certification as production process manager of organic processed foods is necessary for the following cases:

   a) Labeling as organic to dried green tea intended for consumers; and
   b) Labeling as organic to products prepared from tea leaves procured from farmers other than by themselves.

2. Rice bran is a by-product of polished rice. Production process managers of organic plants who produced rice bran are able to label as organic to the products in accordance with the JAS for organic plants.

(Regarding Article 4)

(Q49) In which point the organic production management of fields is considered as started?

(A)

1. The organic production management for perennial plants starts at the point when the use of prohibited substances is stopped.

2. There are two cases where the organic production management for other plants than perennial plants is considered as started:

   a) at the point when the use of prohibited substances is stopped, if for no products are cultivated in the fields; and
b) at the point when the products are harvested, if products are cultivated when the use of prohibited substances is stopped.

(Q50) How are organic certified fields treated in the land improvement project area accompanying land readjustments?

(A)

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

(Q51) The JAS for organic plants provides that “necessary measures shall be taken in fields, so as to prevent prohibited substances from drifting and flowing from the surrounded areas.” What kinds of criteria are applied?

(A)

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

(Q52) How to deal with the case where a field falls under areas subject to aerial spray of agricultural chemicals?

(A)

Please file a complaint to the responsible organization in the district so that the field is not subject to aerial spray. Necessary measures should be taken so as to prevent flowing of agricultural chemicals.
(Q53) How do registered certifying bodies confirm whether or not measures to prevent drifting of agricultural chemicals by aerial spray are taken?

(A)

Each registered certifying body judges whether or not proper measures are taken to prevent agricultural chemicals from drifting into the fields, given the geographical condition, the wind direction and how aerial spraying is applied. This is true of the fields outside the aerial chemical spraying area because spraying might be applied nearby.

(Q54) What are exact measures to prevent prohibited substances from mixing into irrigation water?

(A)

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

(Q55) What kinds of plant products are harvested from perennial plants?

(A)

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

(Q56) Why does the reduction of organic production period apply to “newly developed fields or fields not used for cultivation, in which prohibited substances have been applied to no less than two years”?

(A)

Because prohibited substances will not be used for no less than three years, if the organic production management is applied for no less than one year to the fields in which prohibited substances have not been applied for no less than two years.
(Q57) How are plant products handled, if a fields are affected by drifting of agricultural chemicals applied to other fields?

(A)

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

(Q58) What are “scion” and “stock”?

(A)

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

(Q59) What does “a part” mean in “whole or part of the plant body”?

(A)

It includes stems and seed tubers of aroids and sweet potatoes.

(Q60) What are seed propagating plants and vegetative propagating plants provided in the criteria of “seeds or seedlings to be sown or planted in organic fields”? What are the youngest available seedlings?

(A)

1. Seed propagating plants are plants that grow from seeds and do not include those which propagate from cuttings. Examples include grains such as rice and wheat, leafy vegetables such as spinach, tomatoes, and vegetable fruits other than strawberries.

2. Vegetative propagating plants are plants that do not grow from seeds, but grow from cuttings not to lose their essential characteristics. Examples include fruits, potatoes and tea.

3. The use of the youngest seedlings of vegetative propagating is permitted, if
organic seedlings or seedlings not treated with prohibited substances are not available. The youngest seedlings are scion for fruits and seed tuber for alimentary konjac. Seeds and seedlings should be from organic sources. If they are not available, the period under organic production should be lengthened as possible by procuring the youngest seedlings.

(Q61) What are edible sprouts?

(A)

1. Seeds or seedlings for organic edible sprouts should be from organic sources. The provision of substituting non-organic seeds and seedlings shall not apply to edible sprouts.

2. Edible sprouts are plant products that grow only by the productivity of seeds or seedlings, not by the productivity of organic fields. Examples include sprouts of white radish, pea and bean derived from the productivity stored in seeds, and shoots of *Aralia elata* and tea derived from the productivity stored in nursery stock or scion. Please note that sprouts are labeled as organic, if they are stored in organic fields in the planting season and harvested in the next season.

(Q62) Please provide the reason for the criteria of “seeds and seedlings in case of a difficulty to obtain from organic sources in a normal way” has been revised.

(A)

1. The previous standard was not clear about kinds of seeds and seedlings which are to be sourced in case of a difficulty to obtain from organic sources. There were cases of labeling as “organic” to products managed under organic production for a limited period, such as by planting seedlings in organic fields after raising them in conventional fields until flowering or storing much nutrition.

2. The criteria were thereby clarified in accordance with *the Codex Guideline for Organically Produced Foods* (hereafter the “Codex Guidelines”), adapted by the Codex Alimentarius Commission, the Joint FAO/WHO Food Standards Programme, because those products as 1. above are not the products which consumers associate with. (The use of seeds and seedlings not treated with prohibited substances is permitted if those from organic sources are not available. If those not treated with prohibited substances are not available, the use of conventional seeds and seedlings is permitted. In the latter case, seeds shall be sourced for seed propagating plants and the youngest available seedlings shall be sourced for vegetative propagating plants in order to lengthen the period under organic production as much as possible. Please note that the exemption does not apply to organic edible sprouts. Organic seeds and seedlings shall be always
sourced for edible sprouts such as radish sprouts, because they grow with nutrition from seeds and seedlings and do not need nutrition from land.)

3. Please note that the previous criteria still applies as an interim measure in the supplementary clause and will be effective for the next five years until the next revision. This is because the immediate application is difficult in the light of current organic production. Conventional seedlings may be sourced due to the unavailability of the technique of raising organic seedling.

(Q63) What is “the case of difficulty to obtain in a normal way”?

(A)

1. “The case of difficulty to obtain in a normal way” includes cases that the amount of seeds or seedlings intended for sale is extremely limited or the price of seeds or seedlings is extremely high.

2. Please note that this is the provision permitted in exceptional cases and organic seeds or seedlings shall be sourced in principle. In other words, seeds or seedlings shall meet the criteria of “seeds or seedlings to be sown or planted in organic fields” as provided in article 4 of the JAS for organic plants.

3. When seeds or seedling from other than organic sources are used because of an unavailability, seeds shall be sourced for seed propagating plants, and the youngest available seedlings shall be sourced from vegetative propagating plants. They shall be managed under the criteria of the Organic JAS after sowing or planting.

(Q64) What does “the method utilizing biological functions” mean?

(A)

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

(Q65) Which case falls under “cases where the productivity of fields derived from the soil are not maintained or increased only by the method utilizing biological functions”?

(A)
The case include where the product is not able to normally grow because of lack of nutrients.

(Q66) What are cultural, physical and biological methods to control noxious animals and plants?

(A)

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

2. The physical method is a physically controlling way by gravity, light, heat, sound and other. Its examples include: a) selection of seeds by specific gravity; b) interception of light; c) utilization of light traps and light repelling worms; d) utilization of plastic tapes; e) disinfections of seeds by hot water; f) disinfections of soil by solar heat or steam; g) utilization of sounds such explosive sound; h) utilization of electricity; and i) utilization of net.

3. The biological method is a controlling way by interactions between organisms. Its examples include; a) utilization of antagonistic microorganisms; b) utilization of natural predatory and parasitic enemies; and c) utilization of small animals.

(Q67) What does “selection of species and varieties” mean?

(A)

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

(Q68) What does “adjustment of cropping season” mean?
It means to shift the cropping season for the purpose of avoiding the period in which noxious animals and plants are most active, and minimizing their damages.

(Q69) What does “utilization of light” mean?

(A)

It means controlling or suppressing noxious animals and plants by light traps, light repelling worms and light reflection such by plastic tapes.

(Q70) What does “utilization of heat” mean?

(A)

It means disinfection of seeds by hot water, disinfection of soil and weeding by solar heat and steam.

(Q71) What does “utilization of sound” mean?

(A)

It means repelling noxious animals by explosive sound and other sound.

(Q72) What does “mechanical methods” mean?

(A)

It means the use of cultivating machines and mowing machines.

(Q73) What are microorganisms suppressing the proliferation of the microorganisms which cause diseases and damages?

(A)

They are microorganisms which keep an appropriate balance of microorganisms in
soil energize them and suppress the proliferation of the microorganisms which cause disease and damages by antagonistic organisms.

(Q74) **What are predatory animals for noxious animals and plants?**

(A) They are natural predators and parasites, such as: lady beetles which eat aphids; wild birds, frogs and hornets which eat harmful worms; and *aigamo* (a crossbreed of wild and domestic ducks), carps and crucian carps which eat weeds.

(Q75) **What are plants which repel noxious animals and plants?**

(A) They are those which repel noxious animals and plants by their smells, such as spice crops.

(Q76) **What are plants effective for suppressing the emergence of noxious animals and plants”?**

(A) They suppress the emergence of noxious animals and plants. The examples are marigold, an antagonistic plant for eelworms, and plants suppressing weeds by blocking sunlight.

(Q77) **What are cases of imminent or serious threat to the crop?**

(A) They are cases where noxious animals and plants exist or are highly likely to emerge in the surrounding fields or in the organic fields based on the previous experiences, and products are likely to be seriously damaged.

(Q78) **Why are “general management” and “management of raising seedlings” newly provided in the production method?**
1. Substances with chemosynthetic materials may contaminate organic products or fields, if they are applied or in contact with plants or soils. Their use is thereby prohibited in organic production under the previous standards. The revision clarified this regard as “general management” to fully inform operators including production process managers.

2. “Management of raising seedlings” is provided to clarify the criteria of raising seedlings other than in organic fields, such as nursery boxes, nursery pots.

(Q79) Is the use of salt water permitted for selecting seeds by specific gravity?

(A)

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

(Q80) Do fields include places for raising seedlings, such as nursery boxes or nursery beds?

(A)

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

(Q81) Do the criteria of “management concerning transportation, selection, processing, cleaning, storage, packaging and other post-harvest processes” apply until consumers receive the products?

(A)

The criteria apply from the harvest until the shipment by certified operators of organic plants. Products shall be managed after the shipment so that they are not mixed with uncertified products or affected by prohibited substances. Article 19-12 of the JAS Law and article 72 of the Ministerial Ordinance provide that the Organic JAS logo shall be removed if the products are mixed with conventional products.
(Q82) What kinds of materials are used for cleaning machines and tools in the process of “management concerning transportation, selection, processing, cleaning, storage, packaging and other post-harvest processes?”

(A)

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

(Q83) What is the quality preservation and improvement?

(A)

The quality preservation is maintaining the certain level of quality and preventing the quality deterioration, such as preserving freshness by nitrogen and carbon dioxide. The quality improvement includes removing the astringency of persimmons by ethanol.

(Regarding Attached Table 1)

(Q84) What are those listed on Attached Table 1 based on?

(A)

The fertilizers and soil improvement substances listed on Attached Table 1 are based on those positively listed on the Codex Guidelines.

(Q85) Why were the lists of fertilizers and substances for plant pest and disease control permitted in cases of imminent or serious threat to crop?

(A)

The JAS for organic products are provided in line with the Codex Guidelines. The revisions to the lists of fertilizers and substances for plant pest and disease control are in line with the revisions to the Codex Guidelines. The revisions to the lists in the Organic JAS include:

a) Including newly registered natural substances for plant pest and disease control if they meet the Codex Guidelines;
b) Removing substances which do not meet the organic production principle, such as one which is toxic to fish; and
c) Including substances based on producers requests if consumers agree to the additions.
(Q86) What are the criteria for permitted substances only in cases of imminent or serious threat to organic plants?

(A)

1. Attached tables provide permitted substances only in cases of imminent or serious threat to organic plants. Sources of the substances are provided in the attached tables as well.

2. Article 10 of the Government Ordinance prohibited the use of chemically synthesized agricultural chemicals, fertilizer and soil improvement substances, except for those provided by the Minister of Agriculture, Forestry and Fishery by Notification No.1005 of the Ministry of Agriculture, Forestry and Fishery, July 14th, 2000.

3. When the substances listed in attached tables of the Organic JAS are prepared and formulated, fertilizer, soil improvement substances and processing substances are limited to “those without chemosynthesized substances” under article 4 of the Organic JAS.

(Reference)

Notification No.1005 of the Ministry of Agriculture, Forestry and Fishery 2000

Agricultural chemicals, fertilizers and soil improvement substances of which active ingredients are synthetic chemicals listed below.

1. Agricultural chemicals

Sulfuric smoking agent, powdered sulfur, sulfur/soybean lecithin wettable powder, sulfuric/copper wettable powder, vinegar, wettable sulfur, calcium oxide, sex pheromone agent, lime sulfur, sodium hydrogencarbonate wettable powder and sodium bicarbonate, sodium hyrogencarbonate/copper wettable powder, spreader, copper wettable powder, powdered copper, carbon dioxide for fumigation, metaldehyde (granular formulation), copper sulfate and wax wettable powder

2. Fertilizers and soil improvement substances

Sulfur, calcium chloride, calcium hydroxide, fertilizer for providing trace elements, aluminum calcium phosphate

(Q87) Is the use of composts derived from genetically modified crops permitted?
(A)

The Organic JAS does not have any provisions to prohibit the use of composts derived from genetically modified crops. This reflects the difficulties to ensure that substances below would not contain genetically modified crops and to procure the substances not containing genetically modified crops: a) material derived from plants and plant residue; b) materials derived from fermented, dried or baked excrements; c) material derived from by-products of food & textile industries; d) processed animal products from slaughterhouses or fish industries; and e) materials derived from fermented leftover foods.

(Q88) Is the use of oil meals and powdered oil meal derived from Canola oil extracted by organic solvent permitted as composts?

(A)

The use is permitted unless synthetic substances are added.

(Q89) The revised Attached Table 1 of the Organic JAS for plant products does not contain substances from fish meal powder to steamed bone meal. Is the use of those substances permitted for production of organic plants?

(A)

The mentioned substances are categorized into “by-products of food & textile industries” and “processed animal products from slaughterhouses or fish industries” in the revised Attached Table 1 of the JAS for organic plants. The use of the mentioned substances is permitted, if they satisfy the criteria of “manuring practice in the fields” in article 4 of the Organic JAS and they are “those derived from natural sources, or natural sources without the use of chemical treatment” as provided in the substance criteria of Attached Table 1.

(Q90) What are “trace elements”? Is it the use of synthetic trace elements permitted as well?

(A)

Trace elements include manganese, boron, iron, copper, zinc, molybdenum and chlorine and the criterion is “those without chemosynthesized substances other than trace elements themselves.” The use of synthetic trace elements such as “manganese sulfate” and “zinc sulfate” is permitted.
(Q91) What kinds of substances are included in “other fertilizer and soil improvement substances” after the revision?

(A)

1. Soil fertility shall be maintained or increased only by composts derived from by-products from the mentioned fields, or the methods effectively utilizing biological functions of organisms in the fields or in the surrounding areas as provided in “manuring practices in fields.” The use of fertilizers and soil improvement substances listed in Attached Table 1 is permitted, only in cases where the measures identified as above are not effective.

2. After the latest revision of the Organic JAS, the use of “other fertilizers and soil improvement substances” is permitted, only in cases where the use of substances listed in Attached Table 1 is not effective for maintaining or increasing soil fertility.

3. The use of substances categorized in “other fertilizers and soil improvement substances” should not be permitted, if they are substituted by the substances listed in Attached Table 1.

4. The use of substances which fall under specific control substances under the Agricultural Chemicals Control Law and apparently have pest control effects should be prohibited.

(Q92) What are the criteria for evaluating whether or not substances fall under “substances which may be used, only in cases where the listed substances in Attached Table 1 are not effective for maintaining or increasing soil fertility” in Attached Table 1 of JAS for organic plants?

(A)

1. The substance in question shall satisfy “manuring practice in fields” in article 4 of JAS for organic plants and the criteria contained in Attached Table 1 below:

   a) The use is essential for the intended objective and is not substituted by other substances listed in Attached Table 1 in quality or quantity;
   b) Natural substances or derived natural substances without the use of chemical treatment (those produced by burning, calcining, melting, dry distilling, and saponifying natural substances and those produced from natural substances without any chemical treatment);
   c) Those manufactured without the recombinant DNA technology; and
   d) Those which objectively have no effects for pest and disease control. (i.e. those whose medicinal effects are not recognized by the Subcommittee for Specific
Agricultural Chemicals, the Agricultural Chemical Section of the Council for Agricultural Materials.)

2. The substances satisfying the criteria mentioned in 1 above shall also comply with the following criteria:

   a) its use does not cause or contribute to a negative impact on the environment and the ecosystem through the process of manufacture, use and disposal;
   
   b) its negative impact on health and quality of life of human or other animals is minimum; and
   
   c) its use does not negatively impact on the soil system balance, the soil’s physical property and the quality of water and air.

(Q93) Is the use of sewage sludge permitted for the production of organic plants?

(A)

The use of sewage sludge is extremely limited in organic production, because the certified production process manager who uses sewage sludge should manage and control its origin and discharge process, and justify that the sewage sludge is from natural substances or derived from natural substances not chemically synthesized.

(Q94) Is the use of human excrements permitted?

(A)

The use of human excrements is prohibited, because of the following two reasons:

a) Attached Table 1 limits “composted or fermented excrements” to those derived from livestock and poultry; and

b) Human excrements do not fall under “the fertilizer and soil improvement substances which may be used, in cases where soil fertility is not maintained or increased,” because “composted or fermented excrements” are explicitly indicated in Attached Table 1.

(Regarding Attached Table 2)
(Q95) What is the basis for selecting the substances listed in Attached Table 2?

(A)

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

(Q96) What substances fall under “pyrethrum emulsion and pyrethroids emulsion” listed in Attached Table 2 of JAS for organic plants?

(A)

Those should be extracted from pyrethrum, excluding piperonyl butoxide as a synergist. Examples of August 2005 include:

- Kincyo pyrethrum emulsion 3;
- Pireol;
- Tomono pyrethrum emulsion 3;
- King pyrethrum emulsion 3;
- Para-giku Panic; and
- Paibenika spray.

(Q97) What substances fall under “biological control and biopesticide formulation” of Attached Table 2 of the JAS for organic plants?

(A)

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

2. The examples of “biological control and biopesticide formulation” as of August 2005 include:
- Bacillus thuringiensis (wettable powder or granular formulation) (irrespective of dead or alive);
- Beauveria brongniartii agent;
- Verticillium lecanii wettable powder;
- Paecilomyces fumosoroseus wettable powder;
- Beauveria bassiana emulsion;
- Steinernema carpocapsae agent;
- Sternebema glaseri agent;
- Monacrosporium phytomaculatum agent;
- Pasteuria penetrans wettable powder;
- Phytoseiulus persimilis agent;
- Amblyseius cucumeris agent;
- Amblyseius degenerans agent;
- Amblyseius californicus agent;
- Aphidius colemani agent;
- Eretmocerus emarginatus agent;
- Encarsia formosa agent;
- Diployphus isae agent;
- Dacnusa sibirica agent;
- Diployphus isae dacnusa sibirica agent;
- Neochrysocharis formosa agent;
- Frankliniorthrips vesiformis agent;
- Aphidoletes aphidimyza agent;
- Orius strigicollis agent;
- Harmonia axyridis agent;
- Orius sauteri agent;
- Chrysoperla carnea agent;
- Homona magnanima granulosis virus adoxophyes orana fasciata granulosis virus wettable powder;
- Zucchini yellow mosaic virus less virulent strain wettable powder;
- Talaromyces flavus wettable powder;
- Trichoderma atroviride wettable powder;
- Apathogenic fusariumoxysporum wettable powder;
- Agrobacterium radiobacter strain 84 agent;
- Apathogenic erwinia carotovora wettable powder;
- Pseudomonas fluorescens agent;
- Pseudomonas CAB-02 wettable powder;
- Bacillus subtilis wettable powder;
- Xanthomonas campestris liquid; and
- Drechslera monoceras agent.

2. Japanese Agriculture Standards of organic processed foods

(Regarding Article 2)
(Q98) Why processing methods are limited to those applying physical or biological functions?

(A)

The processing methods applying physical or biological functions are appropriate to keep the properties of organic foods and ingredients in manufacturing and processing. *The Codex Guidelines* have the same principle with the Organic JAS.

(Q99) What exactly are processing methods applying physical and biological functions?

(A)

1. The physical methods include mechanical methods such as comminution, mixing, molding, heating, cooling, compression, decompression, desiccation and isolation (filtration, centrifugation, compression, distillation, etc).

2. The processing methods applying biological functions include fermentation applying fungi, yeast and bacteria. Fungi, yeast and bacteria in this case are not considered as ingredients.

(Regarding Articles 3 and 4)

(Q100) Why are the criteria for processing aids included?

(A)

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

(Q101) Do “ingredients” of article 4, the JAS for organic processed foods require gradings twice?

(A)

Manufacturers should be certified under the provision of article 14 of the JAS Law, and grade organic plants as ingredients and organic processed foods as final products, when they use plant products grown by themselves. Please note that attaching grading labels to organic plants as ingredients is not necessary.
(Q102) How are “the same kind of plant and livestock products with organic plants and organic livestock products” and “the same kind of processed foods with organic processed foods” in “ingredients” of article 4 identified?

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

(A)

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

(Q103) What exactly are those derived from the recombinant DNA technology?

(A)

They are foods and food ingredients derived from the recombinant DNA technology and do not include milk products and meats made from domestic animals which were fed with plant products derived from the recombinant DNA technology.

(Q104) How foods are confirmed whether or not they were ionizing radiated?

(A)

The use of ionizing radiation is permitted only for potato for preventing germinations in Japan. Ionizing radiated foods should be labeled as such under the labeling guidance under the Food Sanitation Law.
(Q105) Is the use of food additives other than those listed on Attached Table 1 permitted in non-organic plants, livestock, marine products and processed foods made from those?

(A)

1. The use of food additives other than food additives listed on Attached Table 1 is permitted for non-organic plants, livestock, marine products and processed foods as ingredients of organic processed foods.

2. Please note that the use of ingredients containing those additives is not permitted, if the food additives are not carry-overs, but perform technical functions in organic processed foods and considered as being used in the organic processed foods.

(Note) "Carry-overs" are those used for in the process of manufacturing or processing ingredients of foods, not for in the process of manufacturing or processing the foods themselves and are included in quantities less than that required to achieve technological functions.

(Q106) Is the use of refined salt with bittern derived from seawater permitted as dietary salt in processing of organic processed foods?

(A)

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

(Q107) Non-organic ingredients should be no more than 5 percent of the total ingredients. What is the calculation basis, an ingredient basis or a final product basis?

(A)

The basis is an ingredient basis. When the same kind of ingredients in different conditions such as undiluted, concentrated, dried are used, ingredients should be calculated after converting them in an equivalent basis. Examples include straight juice and concentrated juice, liquid soup stock and powdered soup stock, arum root and konjac powder. Products dried and processed for the purpose of storing and preserving, such as concentrated juice and konjac powder, may be used after water added and graded. Please note that weights of processing aids are excluded from the total weight of ingredients, because processing aids do not remain in final product.
(Q108) Is the use of ingredients applying the recombinant DNA technology permitted in processed foods, if they are no more than five percent of the total ingredients of organic processed foods?

(A)

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

(Q109) Is the use of microorganisms cultured with materials applying the recombinant DNA technology permitted in manufacturing organic processed foods?

(A)

The use of culturing materials for microorganisms applying the recombinant DNA technology is permitted, because they are not ingredients of organic processed foods.

(Q110) Why are those containing organic ingredients in no less than 70 percent and below 95 percent not provided in the JAS for organic processed foods?

(A)

The Codex Guidelines permit the use of non-organic ingredients within the maximum level of 5 percent, where in cases organic ingredients are not available or in sufficient quantities. Member countries may consider the elements particular for products containing 95 percent and 70 percent of organic ingredients marketed in their territory. The JAS for organic processed foods permits the use of non-organic products within the maximum limit of 5 percent, taking into account the Codex Guidelines, manufacturing practices and consumer preferences.

(Q111) The use of ionizing radiation for pest control is prohibited. Is its use for the production management permitted?

(A)

The use of ionizing radiation for pest control, food preservation, pathogenic removal or hygiene is prohibited, but permitted in the production management for checking contents or foreign objects. The exposure dose must be no more than 0.10 Gy.
The same limit of no more than 0.10 Gy applies for the X-ray examination at custom clearances of imports.

(Q112) Is the use of chemosynthetic disinfectants or detergents permitted for cleansing plant products as ingredients of organic processed foods?

(A)

The use of those not listed on Attached Table 1 is prohibited, because the criteria of ingredients in article 4 include processing aids. Both ozone water and electrolysis water should not be used.

(Q113) What kind of water is used as an ingredient of organic processed foods? Is the use of disinfectants such as sodium hypochlorite permitted for making well water drinkable?

(A)

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

(Q114) Is the use of detergents and disinfectants permitted for machines and equipments used in the processing process?

(A)

The use of detergents, ozone water and electrolysis water is permitted. Exposure of ingredients and products to detergents should be avoided by rinsing machines and equipments by water. Glass bottles should be treated as well.

(Q115) How should pests and animals be controlled in manufacturing plants and storage warehouses when organic processed foods manufactured or ingredients are kept?

(A)
1. Pests and animals should be controlled at plants and warehouses by physical methods such as physical barrier, sound wave, ultrasonic waves, light, ultraviolet rays, trap, and temperature management. If those methods are ineffective, the chemicals drugs listed on Attached Table 2 may be used on the condition that necessary measures should be taken so as not to expose ingredients and products to the chemicals.

2. When the period for manufacturing organic processed foods is allocated, the use of chemicals for pest and animal control not listed in Attached Table 2 is permitted. Those chemicals should be removed by the start of manufacturing organic processed foods so that ingredients and products are not affected.

(Q116) Are production process managers able to include deoxidants in packing products?

(A)

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

(Regarding article 5)

(Q117) Why is labeling “organic XXX” prohibited to the organic processed foods of plant and animal origin with the same generic names with organic processed foods of plant origin?

(A)

1. Organic processed foods of plant origin used to be distributed with labels of “organic XXX” before the revision. “Organic processed foods of plant origin” are specified plant products, for which standardizations of labeling names are identified. Labeling “organic” to processed foods other than “organic processed foods of plant origin” is prohibited. Please note that those fall under both “organic processed foods of plant origin” and “organic processed foods of plant and animal origin,” depending percentage of ingredients, shall not be labeled as organic, if they are not organic processed foods of plant origin. Examples include foods containing dairy products no less than 5 percent.

2. Specifying “organic livestock,” “organic livestock processed foods” and “organic livestock processed foods” is necessary in order to avoid the situation in 1. above. Specification is subject to consultations with the relevant part of the government, taking into account marketing of organic livestock products and processed foods after the revision of the JAS, however, it is difficult because of mainly two reasons below:
a) only those with relevant Japanese Agricultural Standards are subject to specification; and

b) consumers are not misled because livestock products and livestock processed foods which are produced by different methods than the JAS for organic livestock products and labeled as “organic” are not seen in the market.

(Q118) What are examples of organic processed foods of plant and animal origin with the same generic names with organic processed foods of plant origin?

(A)

1. Labeling regulations apply to generic names, where processed foods are produced by general methods and plant ingredients are no less than 95 percent of the total ingredients.

2. Labeling the same names of “organic processed foods of plant origin” to other products than those is prohibited in cases identified as 1. above.

3. Labeling “organic” or ambiguous labeling is prohibited to those products contain no less than 5 percent of livestock ingredients, even if those comply with the organic standard.

4. Examples include noodles, crackers, cereals, processed soybean curd products, Japanese sweets and etc.

(Q119) What kinds of labels are permitted for organic processed foods of plant and animal origin which have the same generic names with organic processed foods of plant origin?

(A)

1. Those processed foods are able to carry only generic names, because labeling “organic XXX” is prohibited.

2. Please note that those which are graded in accordance with the JAS are able to carry the Organic JAS logo, the labeling that they are certified by the Organic JAS or the overview of the Organic JAS system based on the fact. Those labels contribute to differentiating themselves from ordinary foods and informing consumers that those are certified under the JAS.
(Regarding Attached Tables)

(Q120) Is the use of those derived from the recombinant DNA technology permitted as ingredients for manufacturing food additives?

(A)

The use of ingredients derived from the recombinant DNA technology is not permitted.

(Q121) Is the use of calcinated calcium, which is included in existing additives, permitted in processing organic processed foods?

(A)

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

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

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

(Q122) Are certified re-packers or certified importers able to fill nitrogen in the tea packaging process?

(A)

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

(Q123) Why were the chemicals listed on Attached Table 2 of the JAS for organic processed foods revised completely?

(A)
1. The previous chemicals listed on Attached Table 2 were rarely used for the process of manufacturing and processing.

2. The list was revised to add new chemicals that meet the Codex Guidelines among chemicals generally used for pest control in the process of manufacturing and processing.

VII. Labeling

(Q124) Is labeling “organic ingredients are used” permitted to plant products and processed foods without the Organic JAS logo?

(A)

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

   a) Examples of prohibited labeling to products without the Organic JAS logo include: organic, organic agriculture, full organic agriculture, full organic, overseas organic, semi-organic, organic rate xx%, direct from organic farm, organic (trademark registration), transition to organic culture, organic culture with rain cover, organic soil culture, organic taste, certified organic in XX (name overseas country).

   b) Examples of permitted labeling to products without the Organic JAS include: organic fertilizer is used, tomatoes cultivated with organic fertilizers.

   Please note that if the use of organic compost is emphasized on the label, it may confuse that the plant products are produced by organic methods, which may violate the label regulation.

2. The Quality Labeling Standard for Processed Foods (Notification No.513 of the Ministry of Agriculture, Forestry and Fisheries, March 31st, 2000) provides labeling of name, ingredients and other items in a collective panel. Any confusing labeling to products without the Organic JAS logo is prohibited as well. The explanation on the use of organic ingredients with the Organic JAS is permitted with the exact organic percentage of the ingredient.

   a). Examples of prohibited labeling to products without the Organic JAS logo include: organic salad, organic vegetable sauce, organic tomato ketchup, ketchup certified as organic, sauce complying with the organic standard,
organic pasta, and the explanation such as “products certified as organic in overseas.”

b) Examples of permitted labeling to products without the Organic JAS but in which organic ingredients with the Organic JAS logo are used: salad with organic vegetable (xx % of organic vegetables are used), organic ketchup using xx % of organic tomatoes, Tofu (xx % of organic soybeans are used).

(Q125) Is labeling “organic tomatoes without agricultural chemicals” permitted?

(A)

“The expression of organic and without agricultural chemicals” is not recommended, because labeling of “without agricultural chemicals” may mislead consumers by giving an impression of no residual agricultural chemicals as the Labeling Guidelines for Specially Grown Plant Products prohibit its use in the revision in May 2003. Please note that labeling of “organic tomatoes without agricultural chemicals” is prohibited, because labeling of organic products shall comply with the Organic JAS.

(Q126) Does labeling of “organic rice” and “organically cultivated rice” comply with the Quality Labeling Standard for brown rice and polished rice?

(A)

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

(Q127) Shall organic plants carry labeling of only names?

(A)

Organic plants shall be labeled name and place of origin in accordance with article 5 of the JAS for organic plants and article 3, item 1 of the Quality Labeling Standard for fresh foods (Notification No. 514 of Ministry of Agriculture, Forestry and Fisheries, March 31st, 2000). The product shall be labeled as “organic plants” and a generic name such as “tomato.”
(Q128) Shall organic processed foods carry labeling of only name and ingredients?

(A)

1. The labeling of the name of organic processed foods are labeled as provided by article 5 of the JAS for organic processed foods, without prejudice to the Quality Labeling Standard for processed foods (Notification No.513 of the Ministry of Agriculture, Forestry, Fisheries, March 31st, 2000). For processed foods with individual quality labeling standards, labeling shall follow provisions under the relevant individual Quality Labeling Standard.

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

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

4. The importers may label the name and the ingredients in accordance with the JAS for organic processed foods on behalf of the overseas production process managers, when they import organic foods graded by overseas production process managers and collectively label in accordance with the Quality Labeling Standard for processed foods.

(Q129) How organic plants are monitored?

(A)

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

(Q130) Are labeling provisions on organic foods applicable to the food-service industry or home-meal replacement industry?

(A)

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

(Q131) Is a certification as production process managers necessary for selling plant products in accordance with the Organic JAS in cooperation with consumers?

(A)

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

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

a) Labeling subject to regulation:

   - sticker of organic labeling attached to specified plant products;

   - organic label attached to containers, packages and invoices (delivery statements accompanying products) of specified plant products; and

   - notice board of organic labeling identifying that the displayed specified plant products are “organic.”

b) Information not subject to regulation:

   - explanation on organic plants in the media of newspapers, magazines and websites, including those that they are “organic” by photos and illustrations of specified plant products;

   - leaflets, pamphlets, newsletters and notice boards with the same explanation as above;

   - statement to identify organic ones among products supplied next week in order leaflets, including photos and illustrations;

   - statement to identify organic foods in order forms; and

   - newsletters accompanying delivered vegetable boxes in response to consumers’ orders, identifying organic vegetable.
(Q132) How should products be labeled, if they contain organic plants and plant products in conversion to organic?

(A)

They should be labeled as “XX in transition to organic.” Processed foods made from ingredients under the conversion period should be labeled as “XX in transition to organic,” or “organic XX (under the conversion period).”

(Q133) Is labeling the Organic JAS logo by a stamp permitted? Are certified operators able to use the Organic JAS logo made by personal computers by themselves?

(A)

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

(Q134) Is labeling “organic XX used” permitted on fresh foods without the Organic JAS logo?

(A)

1. The Quality Labeling Standard for processed foods permits labeling of “organic XX used,” when processed foods are made from characteristic ingredients such as organic plants. This does not cause any troubles for consumers to choose foods, because used ingredients and processed foods, such as soybeans and tofu, are different and consumers are not confused.

2. The Quality Labeling Standard for fresh foods does not provide as above, because fresh foods are not manufactured or processed. Labeling of “organic XX are used” to simply re-packed products is prohibited under article 19-15-2 of the JAS Law, because it may confuse consumers that the product is “organic.”

3. Labeling of “organic XX are used” is permitted for only fresh foods, in cases where ingredients and products made from them are different, such as mug bean sprout, and consumers are not misled. If all of them are not organic, labeling of the percentage of organic such as “organic XX are used at 50%” is necessary.
VII. Others

(Q135) How are the organic products and fields handled, if earth and sand flew from the surrounding areas into the organic fields due to natural disasters?

(A)

1. The organic fields may be affected by prohibited substances because of earth and sand from the surrounding areas caused by river flooding and landslides due to natural disasters, such as typhoons and earthquakes. The products cultivated at the time of disaster should not be graded as organic, unless flowing of prohibited substances into the fields is clearly denied.

2. The soils of the damaged fields should be returned to organic, by taking for a certain period of time after the products are harvested or removed. Products harvested within one year from harvesting or removing the products at the time of disaster may be labeled as “transition to organic” and products harvested later may be labeled as “organic.”

(Q136) The JAS for organic plants and the JAS for organic livestock products have supplementary provisions of the grace periods “for a while.” How long is the period “for a while”?

(A)

The grace period is provided for “seeds and seedlings to be sown and planted in fields” in the JAS for organic plants and “feeds” in the JAS for organic livestock products in the supplementary provisions of the revisions in 2005. The period “for while” means until the next revision after 5 years.