

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

Index

I. Definition of terms.....	1
II. Organization	2
III. Process of Certification Procedures	2
IV. Supervision Under Organic Regulations.....	15
V. Safeguard of Impartiality.....	18

I. Definition of terms

Certification: To prove, through inspections, that an applicant maintains the management system of its production to be in line with applicable management standards of production.

CSQA EU Certification: For CSQA to prove, through inspections, that an applicant has the management system of the production to be in line with EU Organic regulations EU 848 2018.

JAS Certification: To prove that an applicant is line with “Technical Criteria for Production Process Management Director” and so forth. The scope of JAS certification is organic agricultural products, organic processed foods, organic livestock, and organic feed. The details are prescribed in CSQA Certification Program.

JAS Law: A common name of “The Law Concerning Japan Agricultural Standards, etc. (Law No.175 in 1950)”

Production Process Management (P.P.M.): A controlling body of production of organic agricultural product, organic agricultural feed, organic processed food, organic livestock and/or organic aquatic products.

Re-Packer: A body to sub-divides and/or repacks organic agricultural products, organic agricultural feed, organic livestock, and/or organic processed food.

Inspector: A qualified person who makes an on-site inspection for organic certification and/or certification of JAS with Production Information. Qualification, works, and so forth of an inspector are prescribed separately in CSQA Organic Quality Manual.

Certification Committee member: A qualified person to make a certification decision and a member of the committee to report it to the General Manager.

Qualified person: A person who is qualified to evaluate operators

Split Production: A production where organic and non-organic productions are done by a certain operator (e.g. organic tomato and conventional cabbage)

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

Parallel Production: A split production with the same products produced in organic and non-organic productions (e.g. organic and conventional wheat)

FAMIC (Food and Agricultural Materials Inspection Centre): independent administrative institution that conducts inspection, analysis and monitor labelling related to safety of food chain. In the area of organic certification, it conducts audits of certification bodies and certified operators as requested from MAFF under JAS Law.

II. Organization

1. Office location and hours

The office where all JAS certification activities are performed is located in Via San Gaetano, 74, 36016 Thiene VI (Italy); the hours of CSQA are 8:30 – 13:30 and 14:30 – 17:30 except Saturday, Sunday and public holidays. CSQA office is closed on Saturday, Sunday, public holidays and the Year-end and New Year holidays (from 29 December to 6 January in general) and the week of “*Ferragosto*” (August 15).

2 Organizational structure of CSQA

2.1 shareholder member

A shareholder member is an organization that joins CSQA and supports its purpose.

2.2 Board of directors

CSQA shareholder members assembly is responsible for the appointment of the board of directors, the Chairman of the Board of Directors, of the Deputy Chairman, of the Chief Executive Officer and setting their duties and remuneration in accordance with the law.

2.3 General Manager

Represents CSQA and manages its operations. In order to manage operations appropriately, General Manager is responsible for securing of resources, development of management policy, supervision of certification activities, granting, maintenance, expansion, reduction, suspension and revocation of certification, contractual agreement, delegation of authority to committees or personnel, as required, to undertake defined activities on its behalf, and personnel competence requirements. General Manager has necessary authority and can delegate all or a part of his authority to committees or personnel for its performance.

2.4 Board of Auditors

Auditors are elected by CSQA shareholders members. Auditors supervises the Board and financial situation of CSQA. The auditor’s duty, terms and other details are stated in CSQA Statute.

III. Process of Certification Procedures

1 Scope and objects for Organic JAS Certification

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

1.1 Scope of Certification

1.1.1 Type of products

- CSQA's JAS certification covers operations for "JAS organic agricultural products", "JAS organic processed foods", "JAS organic livestock products", "JAS organic feed", which are regulated under JAS Regulations (hereafter "JAS Organic Products").

1.1.2 Category

- Organic operators to be certified by CSQA under organic JAS Regulations are "Production Process Management (of agricultural products, organic processed foods, organic feed and organic livestock)", "Re-packer" Refer to CSQA JAS Certification Program III.3.1.1 for the details.

1.2 Geographical areas for certification

- JAS certification, cover all over Italy.

1.3 Language accepted in certification process

The official language of CSQA is Italian. Applications written in English are acceptable. Other languages should be translated. Refer to CSQA JAS Certification Program III.2.1.3 for the costs of evaluation in non-Italian language.

1.4 Personnel engaged in evaluation for certification

1.4.1 CSQA personnel involved in JAS certification process (ATM, technical reviewer, inspector, CEC, scheme manager, technical manager) shall satisfy the qualifications specified in CSQA IOP035_VOL.

1.4.2 Person who has conflict of interest with an applicant must not engage in the evaluation process.

1.4.3 Inspectors, technical reviewers, members of the certification committee and other committees must not give advice nor consultation to a potential applicant for solving non-compliance for certification. This shall not apply to explanation about certification in general.

2 Prior to submitting the application for JAS certification

2.1 Applicant for certification

2.1.1 Eligible applicant

- An operator prescribed in CSQA JAS Certification Program III-1.1.2
- A sub-contracted operator who can manage on its own production process, and an operator who is engaged in organic business and wishes to get JAS organic certification.
- An applicant who understands JAS regulation, JAS Organic standards, Technical Criteria and CSQA Certification Program.
- An operator who does not fall under CSQA JAS Certification Program III.3.2.5

2.1.2 Qualification for an applicant

An applicant for organic JAS certification shall have a system to carry out proper management of production, quality control and grading. At the same time, qualification and the number of those who are engaged in

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

production, quality control and grading management shall meet the technical criteria. All persons in charge of each assignment of work shall have completed a JAS course that CSQA designates before a certification decision is made, or preferably before submission of the application, Persons in charge who must finish the JAS training course are:

1. for P.P.M. (both for production and processing operation): production process manager, grading manager, and grading staff(s).
2. for Re-packer: Re-packing manager and labelling staff(s) for grading

2.1.3 Certification fee

- Fees for organic certification of CSQA is provided in **TARIFFARIO PER IL SERVIZIO DI CONTROLLO E CERTIFICAZIONE DEGLI OPERATORI ESPORTATORI GIAPPONE SULLA BASE DEI REQUISITI JAS (TAR_OP_JAS)**
- The cost pertained to access to facilities, use of facilities and activities such as transfer of goods to ensure execution of inspection shall be shouldered by an applicant.
- The cost of translation from and to other languages than Italian has to be paid by the applicant.

2.2 Provision of information

2.2.1 Provision of information to an applicant CSQA provides the summary of this program, the information on the procedures and fees of application for certification and other information necessary for certification.

2.2.2 General explanation on JAS organic regulations and certification system

CSQA administration office will be open to explain certification procedures in general and so forth prior to acceptance of the application. This is for explaining the details of standards and certification processes, but does not include advising and/or consultation for identifying and resolving non-compliance for certification. It also does not include consulting or advising about certification decision.

2.3 Basic Agreement

2.3.1 Basic agreement

All operators who apply to CSQA for organic certification must agree on Agreement on JAS Certification of Organic Operation with CSQA.

2.3.2 Contents of basic agreements and how to make the agreement

Agreement on JAS Certification of Organic Operation prescribes the rights and duties of certified operators, applicant and subcontractor, CSQA's obligation for confidentiality, and other basic agreements. Both parties must sign and keep this agreement. An operator who applies for organic certification to produce for a certified operator both must sign Declaration of Parties to Subcontracting Requirements to attach to their agreements with CSQA.

3.1 Categories of applicants

3.1.1 Categories of operation

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

Applicants and certified operations are categorized into the following three categories. An applicant should follow CSQA's instruction if necessary.

- Production Process Management (P.P.M.) An individual or an organization that operates the management system for organic foods production. Three (3) technical criteria for certification are set by type of operations.

a) P.P.M.. of Organic Agricultural Products and Organic Feeds (Limited to those prepared or selected only): An individual farmer, a farmer group, an agricultural cooperative or an agricultural company that produce organic agricultural products can be a P.P.M. of agricultural products and/or feed. A foreign operator is called as a foreign P.P.M.

b) P.P.M. of Organic Processed Foods and Organic Feeds (Excluding those prepared or selected only): A manufacturer who processes the organic agricultural products/feed and/or organic processed products/feed can be a P.P.M.. for organic processed food and/or organic feed. A foreign operator is called as a foreign PPM. Refer to CSQA Certification Program I for terming this category as "processor" in CSQA Certification Program I.

c) P.P.M.. of Organic Livestock: An operator who produces organic JAS livestock products can be a P.P.M. of livestock. A foreign operator is called as a foreign P.P.M.

- Re-packer (Re-packer of organic agricultural products, organic processed food, organic processed food, organic feed and organic livestock products) : An operator who sub-divides, and/or re-packs organic raw products, organic processed products, and organic processed food, and so forth. A foreign operator is called as a foreign re-packer.

3.1.2 Points for farmer group certification

It is a CSQA's policy that CSQA will certify an operator as a P.P.M. as long as it keeps adequate internal control system and satisfies the requirements listed below.

In this case, P.P.M. should be registered as a legal person and can be a group of farmers or distributing enterprises.

- The members of a group practice basically same production system.
- The members jointly sell the products.
- The size of the operation including the production method, its facilities, and its use of inputs is manageable for the P.P.M.
- The P.P.M. can continuously ensure the entire group members comply with the Standards and follow their internal regulations by such ways as visiting fields (internal inspection) and checking records as often as necessary, at least once year. This is verified by witness audit(s) by CSQA at on-site inspection.
- The P.P.M. and its members (farmers) make agreements that ensure compliance with organic standards and certification programs, production that meets their internal regulations, and cooperation with CSQA's inspection and audit.
- The P.P.M. of grower group, regardless of certification program, shall assign the managers to control production, described in 2.1.2, and they shall complete adequate training by CSQA.

3.1.3 Points for subcontracted farmer and processor

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

A certified P.P.M. can sub-contract a part of its operation with an operator, which is not certified on its own right. Where a certified P.P.M. includes a sub-contractor in its certification, a certified P.P.M. and a certified processor have to manage its sub-contracted operation as follows

- The main P.P.M./processor has to check and assure the production method and facilities of sub-contractor.
- The main P.P.M./processor can instruct the sub-contractors about organic operation (newly added sub-contracted producers and processors cannot be included in certification of the P.P.M. until they are inspected and certified by CSQA)
- The main P.P.M./processor periodically verifies that the subcontractors operation is in line with CSQA Standards and CSQA Certification Program
- The main P.P.M./processor has the sub-contractors keep records of its operation
- The main P.P.M./processor carries out auditing verification of organic operation of the sub-contractor by inspecting manuals and records.
- The main P.P.M./processor binds the sub-contracted parties not to market the products.
- The main P.P.M. shall take full responsibility for the sub-contracted operation and be subject to sanctions in the event of non-compliance of the subcontracted parties.
- The main P.P.M. shall have a contract with subcontracted parties for the matters below:
- Sub-contracted parties shall comply with applicable standards
- Sub-contracted parties shall provide CSQA and other bodies such as IFOAM, IOAS, ISO audit agency with necessary information and accept control visits to their facilities.
- Sub-contracted parties shall own and understand the current version of CSQA Organic Standards, CSQA Certification Program and applicable standards.

3.2 Submitting application documents

3.2.1 Application documents

Application for JAS certification, Required Attachment and Statement of Applicant's Operation shall be submitted as instructed by CSQA. Those documents are termed as "JAS Application Documents" hereafter. Applicants are responsible for those documents by collecting all of the necessary information.

When CSQA receives an application from an operator that is certified or was certified, this application is taken as an initial certification and evaluate it according to CSQA Certification Program.

3.2.2 Categories of certification

Applicants shall fill out application documents that responds to each certification categories that they seek and send them to CSQA office.

3.2.3 Attachment of the agreement on sub-contract

In case that a sub-contracted operator is applied for certification, a document that clarifies a subcontracting relationship must be submitted with its application documents.

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

3.2.4 Submission of application documents

The applicant should submit the application to CSQA Administrative Office. If any required documents are missing or the contents of application is not filled in well enough, the application cannot be processed for document review.

3.2.5 Reception by CSQA Administration Office

CSQA shall not refuse application except for the cases below. CSQA notify the reason of refusal to the applicant by letter. a) the applicant who had violated JAS law, and it was executed in punishment of the fine or imprisonment within the past one (1) year, or b) the applicant whose previous organic certification was cancelled within the past one (1) year, or c) the applicant that is organized by the person who was responsible for cancellation of organic certification within the past one (1) year, or d) the applicant who refuses to conclude "Agreement on Certification of Organic Operation" e) the applicant who refuses to pay the fees related to certification services, or has unpaid invoice for the fees of a previous year.

- When CSQA receives an application, it shall check if the application (operator, address, contact, and products) is in the scope of CSQA's certification activities. When there is a shortage and/or unclarity in the contents of application form, CSQA contacts the applicant and confirm that.
- CSQA issues an invoice for application fee immediately after CSQA office receives application documents.
- The manuals and procedures of CSQA is written in Italian and translated into English. CSQA can deal with application from foreign applicants in English.

3.3 Initial evaluation by CSQA office and qualified personnel

3.3.1 Acceptance: Confirmation of documents by CSQA Office

- A Quotation Technical Approver (ATM), after receiving the application documents, makes sure if there is insufficient material, data, report or an omission. A Quotation Technical Approver (ATM) may request additional information or documents, if needed. When this confirmation by the office is over, application for certification can be considered "accepted".
- An applicant may withdraw its application at any stage of evaluation.
- If all necessary documents are not able to be accepted (meaning they are not submitted despite communication) in six months, the Scheme Manager may decide cancellation of the evaluation and return application document to the applicant.
- After receiving the application documents, the Quotation Technical Approver (ATM) will send a quotation for JAS certification services to the applicant.

3.3.2 Document Review: Initial evaluation by qualified personnel after receiving the signed quotation by the applicant

- A qualified person (technical reviewer) will evaluate the application documents without a delay whether it meets the requirements of applicable standards.
- It will be decided whether an on-site inspection can be done or whether more information is necessary.
- When the contents of application do not conform to the standards, further procedure of inspection and certification is denied and the office informs the applicant of the reasons.

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

- If CSQA finds that an applicant has intentionally written false information on application, CSQA has the right to stop the evaluation or issue a certificate.

3.4 Appointing the inspector and assigning the on-site inspection

3.4.1 Planning an inspection

- Scheme manager decides assignment of an inspector, inspection schedule, and frequency of inspections.
- On-site inspection shall be done at least once a year for all operators.
- On-site inspection, including that of subcontracted operation, shall be conducted at least once a year

3.4.2 Schedule of an inspection

- The inspection is carried out in general in the period described below.
- P.P.M. for organic agricultural products, organic feed and organic aquatic products: the season for sowing or transplanting, season when damage by disease and/or insects happens frequently, harvesting season, and the season of shipment.
- Processor: when the raw materials are received, at the busy time of processing, or shipment or storing.
- Re-packer: when the raw materials are received, when it operates the subdividing, when it ships the products, or when it stores the products.

3.4.3 Assigning the inspector

- Scheme Manager selects an inspector from the list of the JAS qualified inspectors.
- Scheme manager sends written instructions about the outline of the application to an assigned inspector.
- If an assigned inspector finds any conflict of interest with the applicant, the inspector shall excuse him/herself from the assignment.
- The contract for an inspection comes into effect when the inspector receives the instructions. ▪ Guidelines for selecting an inspector is as follow
- The inspector shall satisfy the qualifications provided in CSQA IOP035VOL.
- Any inspector should not inspect the same operator for more than three successive years. Another inspector should be assigned for the fourth year.
- The inspector shall have professional knowledge and experience about the types of products the operator produces and/or handles
- The operator in principle cannot reject an inspector assigned by CSQA. In case reasons for a clear and understandable objection are submitted in a proper way, CSQA assigns another inspector by the following rule: Procedure as an exemption to the afore-mentioned basic rule a) The applicant submits to CSQA a written paper to clarify the reasons for the objection. b) The Scheme Manager decides whether objections are acceptable or not by checking the past records or hearing from the inspector about the applicant's claim

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

- In case that an inspector withheld information on interests including consultancy and relationship by blood and marriage and this fact was revealed so after certification, CSQA shall promptly inspect and make a certification decision again.

3.4.4 Preparation for an inspection

- After the inspector received the inspection instructions, CSQA shall provide all information needed.
- The detailed schedule such as inspection date should be decided between the inspector and the operator.
- At least seven (7) days prior to the inspection date, the inspector shall inform the applicant and CSQA by sending Inspection Plan about the date and time of inspection, persons who should be interviewed and preparation of applicant's documents, records, and facilities for inspection.
- An inspector reviews the application documents. If it is not the first-time inspection, the inspector should be prepared for checking the comments from the previous inspection, which are relevant.

3.4.5 On-site inspection

- An inspector carries out on-site inspection according to the procedures prescribed in CSQA Manual and described as follow:

- At the on-site (at a farm, at a factory, and at other facilities) inspection, the inspector checks whether the information from submitted documents, facts by observation and interviews meet JAS regulation, JAS Organic standards and the technical criteria. If there is any inappropriate case, condition(s) should be notified to the operator.

- An inspector checks the records related to its organic management system.
- An inspector observes the surrounding environment of facilities including fields and factories.
- An inspector interviews about their problems and plans for the solutions.
- When a split production takes place, the operator should well keep records on separate handling of organic products and non-organic products through crop production, processing, storage, and shipment due to higher risk of contamination. The inspector shall verify whether organic products and non-organic products are well separately handled and its risk is well understood throughout all levels of the operation.
- When a parallel production takes place, the following points will be especially inspected due to much higher risk of contamination and co-mingling.

1. Organic products and non-organic products are visually distinguished.

2. An accurate estimated amount of production is recorded and shall be checked against the shipment records.

3. Non-organic farms, post-harvest processing facility, and storage

- At the closing meeting, the inspector must present his/her observations on compliance with JAS Law, Organic JAS Standards and Technical Criteria and let the operator have a chance to question about the notified non-compliances, and then the inspector must receive operator's signature on the inspector's exit report which includes the inspector's observation and the operator's comments.

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

- The applicant responds in their comments to the observations raised at the closing meeting by presenting a plan of corrective actions and the date of its completion. The deadline for the response to observation is set depending on the contents of non-conformity. The applicant should respond to major non-conformity within 7 days after the inspection and to minor non-conformity within 12 days after the inspection, the applicant responds to observation within the period they can.
- An inspector confirms contents of the inspection check sheet verbally with operator. Both parties must sign and stamp on inspector's comments of the inspection check sheet. The operator should keep a photocopy of the signed condition and, at the same time, the inspector shall send a copy of the conditions to CSQA.
- In case that the contents of the application are included in the scope of other operation already certified by CSQA or the contracted CBs, the on-site inspection can be partially or fully omitted based on the document review by using the inspection report and the information on certification of the other operation. In case that the inspection is omitted, the reason shall be specified in the result of the document review. CSQA explains the reason upon request of the operator. The inspection report and the information on certification can be used within a year since it was made.
- CSQA shall make unannounced inspections to all operators in addition to annual normal inspections for at least 10% of all annual inspections. Unannounced inspections are conducted randomly in order to assess the effectiveness of inspections and as scheduled according to the risk evaluation of each operation prescribed in 3.4.6 of this program. Unannounced inspection it means without any prior notification to the operator.

3.4.6 Procedures after inspection

- An inspector submits an inspection report within ten (10) days from the on-site inspection.
- An "inspection report" includes 1. CSQA inspection checklist, 2. inspection memo, 3. attachments and photographs/pictures, which are supporting documents.
- An inspector may ask the operator to submit additional documents, which are not available or inadequate at the time of inspection.
- An inspector includes all the information necessary for certification in an inspection report.
- Inspectors shall be able to make recommendations regarding non-conformities but shall not make an overall judgment of whether the operator should be certified.
- Technical Reviewer checks the inspection report, closing the evaluation activity. If necessary, Technical Reviewer can ask the operator to make corrective actions to the condition before the inspection report is presented to the CEC. When the operator responds to the request for corrective actions, Technical Reviewer attaches the comments on the actions.
- The CEC assesses the conformity of the evaluation, closing the review and decision activity. The CEC can decide the necessity of re-inspection to verify corrective actions.
- When the CEC decides not to grant certification, it will communicate it to the operator with information on the reason of it.

3.4.7 Plural inspections within a year

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

▪ Where the inspection is not carried out in the period indicated in III-3.3.2 of this program, additional inspection is carried out depending on the risk. In this case, the scope of inspection can be limited to a part of operation.

- CSQA sees that the operation has a potential risk if the operation falls into the following conditions:
- P.P.M. group is organized with more than thirty (30) farmers
- P.P.M., processor, and/or re-packer who produce, process, or handle and grade a lot of items
- P.P.M. who also produces conventional crop (especially in parallel production)
- Processor, Re-packer and Importer who frequently purchase ingredients.
- An operator who was questioned about their operations in the past
- Warehouse or Transportation operator who frequently receives and ships out the products
- P.P.M. (Producer and Processor) who produce or process the products in which people hold a keen interest
- Operation where non-compliances were found at previous inspection
- Operation who received complaints

CSQA shall test soil and chemical residue and/or conduct an additional inspection based on what factors the operator falls into or the number of factors.

- CSQA shall test product or soil if contamination risk is high
- CSQA shall conduct an additional inspection if production system has risk. The additional inspection is conducted with or without prior announcement.
- The Scheme manager does the comprehensive assessment of the risk in terms of whether the organic integrity is continuously maintained, and he/she selects the operations with high risk. Based on the above evaluation, CSQA can make on-site inspections to the same operation more than once within a year. In this case, CSQA shall not bill application fee but inspection fee according to CSQA Certification Program III-5.

3.5 Certification Committee (CEC)

3.5.1 Certification

- CEC reviews the application and the inspection report to determine whether the operation of the applicant has qualification and capacity to produce to and adequately label the products to JAS Law, applicable JAS Organic Standard, applicable certification standards and Technical Criteria and whether a certification can be granted to the applicant. The CEC can be composed of one member or, in case of critical NCs, three members or more in odd number.

3.5.2 Condition and corrective measurement

- If there are any conditions imposed by the CEC, the Scheme manager shall request corrections to the applicant. The CEC can evaluate on certification on the answers submitted from the applicant to the Technical

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

Reviewer who evaluate them, in a timely manner. In case the CEC considers an additional on-site inspection needed, it must be done to make sure the proposed corrective actions have been implemented.

3.5.3 Appeal against a decision

- An applicant can make an appeal against the decision made by the CEC Refer to CSQA AGREEMENT'S GENERAL CONDITIONS 16 for details.
- Even if an applicant has been rejected for certification, the same operator can re-apply for certification again with correction of the cause for the rejection.

3.6 Agreement after approval of certification

- The certified operator shall observe Agreement on JAS Certification of Organic Operation.
- All of the certified operators shall report to CSQA on the following articles after approval of certification.

3.6.1 Labelling evaluation

- Labelling of a certified product must be evaluated by CSQA before shipment.
- A certified operator must submit to CSQA a proof of labelling carrying certification logos and organic claims such as “有機 XX” (Organic XX) , “オーガニック XX” (Organic XX), “有機認定” (Certified as Organic), “CSQA 認定” (CSQA Certified), “有機 JAS マーク” (Organic JAS Mark), “CSQA ロゴマーク” (CSQA Logo Mark) , USDA Organic seal, Canada logo, EU organic logo and others before shipment.
- A certified operator fills out and submits CSQA Label Evaluation Form. CSQA evaluates it and notifies them of a result.
- CSQA office evaluates a draft of labelling.
- CSQA Label Evaluation Form confirms compliance of the labels with labelling rules of Organic JAS Standards, and other applicable standards. CSQA shall request correction if deficiencies are found.

3.6.2 Grading report. Report on compliance labelling

- All of the certified operators shall annually sum up the number and related area of graded products (April to March) and submit the grading report to CSQA by the end of June. CSQA shall report a result to MAFF by the end of September annually.
- All of the certified operators shall annually sum up the number and related areas of compliance labelling from April to March and submit it to CSQA by the end of June. CSQA shall report a result to MA FF by the end of September annually.

3.6.3 Report on addition and/or change

- The certified operator shall notify CSQA in advance of any addition and/or change of contents of certification such as ingredients, input materials, equipment, facilities, distribution channel, items for certification, and/or responsible persons.
- Scheme Manager conducts a document review on the changes and addition based on record of past approval and categorize them to (1) significant change/addition, (2) Change/addition that needs decision

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

from the certification committee, or (3) Minor change/addition that does not need a decision from the certification committee. If a change or addition is very small, a document reviewer may inform an approval.

(1) Significant change/addition is a content that could increase risk of contamination and co-mingling drastically from currently certified operations and clearly needs an on-site inspection. In this case, based on a recommendation from Scheme Manager, the President shall instruct an on-site inspection.

(2) 2. Change/addition that needs decision from the certification committee is a content that could increase risk of contamination and co-mingling from currently certified operations but needs a decision from the certification committee whether on-site inspection is necessary. In this case, Scheme Manager instructs staff to send the application to the certification committee. The certification decision would include an approval of change/addition by reviewing documents and a request of on-site inspection. In the latter case, the President instructs an on-site inspection.

(3) Minor change/addition that does not need a decision from the certification committee is a content that does not need a decision from the certification committee because they apparently do not increase risk of contamination and co-mingling. In this case, Scheme Manager notified an approval, which is also reported to the certification committee.

- If an on-site inspection is carried out after reviewing documents or certification decision above, CSQA shall inspect them in line with Certification Program, III-3.3 and make a certification decision in line with 3.5
- An application may be denied. In that case, CSQA shall inform the result and its reasons to the applicant.
- When new members are added, the new member shall be inspected after verification of compliance of their operation by Production Process Manager. The operator has to report the addition to CSQA for confirmation.
- The operator shall not release certified products resulting from such changes / additions until CSQA has approved them.

3.6.4 Issue of Transaction Certificate

- A certified operator may need Transaction Certificate (T/C), which can be requested by submitting Transaction Certification Application (T/C. A) and The Information of the Products to CSQA office.
- CSQA will issue a Transaction Certificate to the applicant after confirming that the transaction is in line with certification of the applicant.

3.6.5 Products of nonconformity

- When fields or facilities for organic production, raw material, seed or seedling becomes nonconforming with Organic JAS Standards, applicable certification standards even due to inevitable reasons, the operator shall report to CSQA the items, the amount of production and the place, the reasons and the time and date of non-conformity.

3.7 Term of Certification Period and Continuation of the certification

- A certification period is as long as three (3) years after the decision. In case of organic JAS certification, there is not an expiry date for certification.
- To maintain certification and for its renewal it is necessary to undergo annual surveillance visit.

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

- Agreement of Certification of Organic Operation made between an operator and CSQA is automatically renewed for one (1) year if the certification is continued.
- If the operator provides copies of the certification documents to others, the documents shall be reproduced in their entirety or as specified in the certification scheme.

3.8 Handling and disposal of nonconformity items

- When fields, production facilities, raw materials, seeds/seedlings etc do not conform with Organic JAS Standards, these products are regarded non-conformable.
- The operator must report to CSQA items, quantity of products of nonconformity, where, why and when they were produced whenever requested by CSQA. The operator shall also inform its buyers that organic label of the products of non-conformity shall be removed or void.
- Items and quantity, time and date of noncompliance, ways of disposal, the methods of labelling must be recorded and the related documents must be kept.
- Crops in a buffer zone, raw materials used for purging etc. are included in non-conformable products.
- In the case of parallel production, it is recommended to keep the records of non-organic products in order to present that there is no mixture of organic and non-organic products.
- It is not permitted to label and sell non-conformable products as organic.
- The non-conformable products must be handled as non-organic products, and the disposing methods and quantities must be recorded.
- An operator must make rules concerning disposal of non-conformable products and state it clearly in manuals. The operator must educate their personnel how to handle non-conformity products.

3.9 Amendment of certification

- The certified Organization may ask for amendments to the scope of certification. Such amendments may concern extension or reduction of certification scope
- The procedures for asking amendments are the same required for the application for certification (see chapter 3.2).
- CSQA will reduce the Organization's scope by removing those parts where the Organization has failed / missed, in a persistent or serious way, to meet / satisfy the certification requirements. This reduction must be consistent with the requirements of the standard used for certification and must take into account the responsibilities of the Organization in terms of placing products / services in the market.
- Any reduction in the scope of certification will be notified to the client and shall be subject to formal certification documents, public information and authorization to use certification marks to ensure that they are clearly indicated in client documentation and publicly available information related to certification etc.

3.10 Keeping the documents relating to certification

- CSQA maintains record of every certified operators for 6 years.

3.11 Discontinue of the certification

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

- If a certified operator intends not to continue the certification, it must notify CSQA of the discontinuation of grading operation in writing.
- CSQA must report it to MAFF and disclose the information of this operator to the public.
- The certified operators must immediately stop using certification documents and return them to CSQA.

3.12 Keeping the documents relating to certification

- The related documents include Application for Certification, Required Attachment and Statement of Applicant's Operation and other relevant documents submitted to CSQA. Original slips or records shall be kept no earlier than the next inspection.
- All documents concerning an application for certification should be kept in preparation for a request to submit from CSQA, other certification body, or the competent authorities.
- The operator shall keep complaint records on organic products and make them available to CSQA when requested.
- A certified operator must keep the related documents for certification for at least one (1) year from issue.

IV. Supervision Under Organic Regulations

1 Reports to the Applicable Authorities

1.1 Report

- CSQA shall report, to the Minister of Agriculture, Forestry and Fisheries via FAMIC, name and address of an operator, their products, fields or facilities relevant to the certification and its contents when CSQA grants a JAS certification.
- Any statutory change of CSQA shall be reported to MAFF through FAMIC in the same way as above mentioned.
- CSQA shall report the following issues when it is decided a case fall into one of them:
 - If products with organic JAS marks or handling methods of organic materials do not comply with JAS standards and it has not been corrected immediately
 - If CSQA decides that products mandatory for certification is not labelled correctly and, therefore it conflicts consumer's interest.
 - If JAS labelling is false, contrary to the fact and CSQA decides that use of JAS standards can be troubled due to losing credibility and the false label cannot be corrected immediately.
- The graded amount (April through March) of JAS organic of all certified operator shall be reported to CSQA by the end of June, and CSQA reports it to MAFF by the end of September every year.
- If CSQA judges any matters related JAS certification should be reported to the competent authorities, they shall be reported to FAMIC after the approval by the board.

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

1.2 Withdrawal of JAS Organic Certification

▪ When the certified operator is no longer compliant with the technical standards for certification and is not expected to comply with the technical standards for certification, in this case the operator will be notified of the decision to revoke the certification at least one week in advance giving a last opportunity to resolve the issue. In these cases CSQA can withdraw the certification:

- when a certified business operator no longer complies with the technical criteria for certification, and it is not expected to become compliant,
- when a Certified Business Operator is violating an order of CSQA and refuses to correct the violation,
- when a certified business operator violates Article 37 of the JAS Law, or Article 10, paragraph 6 or 7 of the JAS Law, as applied by Article 30, paragraph 5, of the Regulation for Enforcement of the JAS Law, except for minor violations, and the violation is intentional or due to gross negligence,
- when the period of time required for a certified business operator to take measures pertaining to a request under Article 48, Paragraph 1, Item 3, sub-item “イ” or “ハ” of the Enforcement Regulations of the JAS Law is expected to exceed one year,
- when the certified business operator does not respond to the request pursuant to the provisions of Article 48, Paragraph 1, Item 3, sub-item “ロ” or “ニ” of the Enforcement Regulations of the JAS Law without justifiable reason,
- when a certified business operator does any of the following without justifiable reason:
 - When a certified business operator has failed to submit a report or submit an object in accordance with Article 48, Paragraph 1, Item 1, sub-item “ニ” (12) of the Enforcement Regulations of the JAS Law, or has submitted a false report or submitted a false object.
 - When a certified business operator refuses, interferes with, or evades the inspection specified in Article 48, Paragraph 1, Item 1, sub-item “ニ” (12) of the Enforcement Regulations of the JAS Law.
 - When a certified business operator fails to answer or makes a false answer to a question under Article 48, Paragraph 1, Item 1, sub-item “ニ” (12) of the Enforcement Regulations of the JAS Law.
 - When a certified business operator refuses, interferes with, or evades the document examination or on-site investigation for the confirmation of Article 48, Paragraph 1, Item 2, sub-items “イ” through “ホ” of the Enforcement Regulations of the JAS Law.
- When the Minister of Agriculture, Forestry and Fisheries requests the revocation of certification from an accredited overseas certification body because a certified business operator did not respond to a request made under Article 39, paragraph 1, of the JAS Law, as applied by Article 39, paragraph 5, without a valid reason.

▪ When CSQA temporarily stops shipment by a certified operator or cancel certification of them, CSQA shall report to MAFF information of the relevant organic operation including the name and address of the operator, category of products, the address of fields and facilities, the date of taking measures, the reasons for the decision.

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

2 Policies of CSQA

2.1 Seminar

- CSQA shall educate and train the people concerned for effective management of JAS system.
- CSQA holds seminars for certified operators to improve their understanding of Organic JAS regulations and technical skills according to Seminar Manual.
- Seminars are held based on the annual plan developed in the beginning of the fiscal year (January). When the JAS scheme manager judges that seminars are needed, they can be held separately from the planned ones.
- CSQA may recognize the seminars held by other bodies after the contents are confirmed. CSQA makes it public the list of seminars it recognizes.

2.2 Monitoring

- CSQA shall conduct a surveillance of the market and monitor implementation of the regulations properly.
- CSQA shall communicate with the authorities whenever necessary and cooperate with them by conducting a surveillance of the market and reporting it to them.

2.3 Cooperation with other bodies

- CSQA shall communicate with registered overseas certification bodies and other certification bodies whenever necessary and cooperate with the authorities on surveillance of certification activities overseas and reporting it to them.

2.4 Document control

- The statute, CSQA JAS Certification Program and other manuals, data (financial statements, list of certified operators etc) and records etc shall be kept according to Document Control Program (*) properly.
- CSQA shall keep records and slips on certification activities, application control log, financial statements and so forth. Paper records shall be retained for at least six years and digital data will be always kept.

2.5 Control of label

- CSQA shall have certified operators properly control the use organic certificates CSQA issues and organic JAS marks.
- CSQA's all concerned parties shall promptly report to the General Manager, improper expression on organic JAS certification on advertisements, catalogue, or other media or misuse of CSQA certificates and organic JAS marks.

(*)MDQ001 5.7.1 Identificazione dei documenti 5.7.2 Distribuzione ed archiviazione dei documenti; MDQ001 Allegato 2: 2. EMISSIONE, REVISIONE E DISTRIBUZIONE DEI DOCUMENTI -3. ARCHIVIAZIONE DEI DOCUMENTI E DELLE REGISTRAZIONI

2.6 Change of requirements

- CSQA shall notify operators of changes of organic standards of its certification scope and other related requirements in a timely manner.

CSQA JAS CERTIFICATION PROGRAM - ADDENDUM OF CSQA QUALITY MANUAL FOR JAS CERTIFICATION

- CSQA shall confirm that certified operators respond to the changes as necessary in an annual surveillance and an irregular surveillance of the operators in the transitional period.

3 Audit by the authority

3.1 Registration as certification body

- CSQA applied to Italian Ministry for Agriculture, Food and Forestry Policies (MIPAAF) and it is registered as a control body under EU Organic regulations 848 2018 and will renew its registration continuously.
- CSQA shall operate certification works as a registered certification body in line with organic EU regulations.
- CSQA applied to MAFF, to be registered as an Organic Certification Body at MAFF under current JAS Law.
- CSQA shall operate certification works as a registered certification body in line with organic JAS regulations.

3.2 Audit of a registered certification body

- CSQA shall undertake an audit by an applicable authority on the certification operation.
- CSQA shall undertake an audit of the execution of certification and the related activities upon a request of Governmental Authorities concerned.
- CSQA shall undertake an audit by MAFF and FAMIC for its operation under the Organic JAS certification. The scope of acceptance of audit is as follows:
 - Manuals and records of the operation for Organic JAS Certification
 - Qualifications and so forth of inspectors and CEC members involved in the operation of Organic JAS Certification
 - Operation plan and its implementation of Organic JAS Certification
 - Organizational structure of board members and staff
 - Financial basis

V. Safeguard of Impartiality

- CSQA certification activity, as required by accreditation rules, is constantly submitted to controls by the committee for the safeguard of impartiality. Such a committee is formed by a fair representation of all the parties involved in certification, such as consumer organisations, industrial and trade associations (producers, processors and distributors), regulatory Authorities, etc.
- The main task of this committee is to safeguard the impartiality of CSQA certification activities and of all related processes, ensuring compliance with applicable accreditation standards and the proper carrying out of certification activities.