

1. TERMS AND DEFINITIONS.....	1
2. ORGANIZATION.....	2
3. SCOPE AND OBJECTS FOR JAS STANDARDS AND TECHNICAL CRITERIA FOR ORGANIC PRODUCTION AND PROCESSING CERTIFICATION.....	2
4. CERTIFICATION PROCESS.....	3
5. SUPERVISION UNDER ORGANIC REGULATIONS	15
6. CSQA POLICIES.....	17
7. SAFEGUARD OF IMPARTIALITY	18

SCOPE

The JAS Certification Program illustrate the procedures followed for the certification of organic products according to the JAS standards for organic farming, integrate the contract for the supply of control and certification services signed by the Operators, provide a broad description of the organization and activity of CSQA Certificazioni S.r.l. and govern the activities that must be performed by the Operators to access and remain in the control system.

The purpose of the certification of organic products is to ensure, independently and with an appropriate level of confidence, through an initial assessment and subsequent official controls (surveillance), that the certified productions comply with the requirements of the JAS standards for organic farming, including their subsequent amendments and additions.

1. TERMS AND DEFINITIONS

Certification: to ensure, independently and with an appropriate level of confidence, through an initial assessment and subsequent official controls (surveillance), that an applicant maintains the management system of its production in line with applicable management standards of production.

JAS Certification: to ensure, independently and with an appropriate level of confidence, through an initial assessment and subsequent official controls (surveillance), that an applicant is line with the applicable JAS Standards and Technical Criteria. The scope of JAS certification is organic agricultural products, organic processed foods, organic livestock, and organic feed.

JAS Law: common name for "*The Law Concerning Japan Agricultural Standards, etc. (Law No.175 in 1950)*".

Production Process Manager (PPM): an operator who carries out production of organic agricultural product, organic agricultural feed, organic processed food, organic livestock and/or organic aquatic products.

Re-Packer: an operator that sub-divides and/or repacks organic agricultural products, organic agricultural feed, organic livestock, and/or organic processed food.

Split Production: when different organic and non-organic productions are done by the same operator (e.g. organic tomato and conventional cabbage).

	ENG_REG_JAS	REV. 04 del 13/02/2025	PAG 2 DI 18
	JAS CERTIFICATION PROGRAM		

Parallel Production: when the same organic and non-organic productions are done by the same operator (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.

2. ORGANIZATION

The headquarters where all JAS certification activities are carried out is located at Via San Gaetano 74 - 36016 Thiene VI (Italy). The opening hours of the CSQA offices are from 09:00 to 13:00 and from 14:00 to 18:00, excluding Saturday, Sunday, and public holidays (during the year-end and New Year holidays, generally from December 29 to January 6, and the week of the Ferragosto holiday).

2.1 Organizational structure

2.1.2 Shareholder Member

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

2.1.3 Board of Directors

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

2.1.4 General Manager

The 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.

2.1.5 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.

3. SCOPE AND OBJECTS FOR JAS STANDARDS AND TECHNICAL CRITERIA FOR ORGANIC PRODUCTION AND PROCESSING CERTIFICATION

3.1 Scope of Certification

3.1.1 Types of products

JAS certification covers operations for:

- JAS organic agricultural products (of plant and animal origin including livestock);
- JAS organic processed foods;
- JAS organic alcoholic beverage;
- JAS organic feed;

in accordance with the provisions contained in the JAS standards and technical criteria.

3.1.2 Category

Organic operators to be certified under organic JAS Regulations are:

- Production Process Managers (PPM - of agricultural products, organic processed foods, organic alcoholic beverage , organic feed and organic livestock);
- Re-packers.

3.3. Geographical areas for certification

JAS certification cover all over Italy.

3.4 Language accepted in certification process

The official language of CSQA is Italian. Applications written in English are acceptable. Other languages should be translated.

3.5 Personnel engaged in evaluation for certification

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.

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

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.

4. CERTIFICATION PROCESS

4.1 Eligible applicant

Organic operators to be certified under organic JAS Regulations are:

- An operator prescribed in JAS Certification Program 3.2;
- 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.

4.2 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 production, quality control and grading management shall meet the technical criteria.

All people 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:

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

4.3 Provision of information

CSQA provides the JAS certification program, the information on the procedures and fees for certification and other information needed.

	ENG_REG_JAS	REV. 04 del 13/02/2025	PAG 4 DI 18
	JAS CERTIFICATION PROGRAM		

CSQA Organic Production 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.

4.4 Basic Agreement

All operators who apply for JAS certification must conclude the “JAS Certification Agreement” with CSQA. The JAS Certification Agreement 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.

4.5 Categories of applicants

4.5.1. Categories of operation

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

- Production Process Manager (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.
 - 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.
 - P.P.M. of Organic Processed Foods including alcoholic beverage 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 including alcoholic beverage and/or organic feed. A foreign operator is called as a foreign PPM.
 - 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 (of organic agricultural products, organic processed food including alcoholic beverage, 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.

4.5.2 Requirements for farmer group certification

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 managers to control production and they shall complete adequate training by CSQA.

4.5.3 Requirements for subcontracted farmer and processor

A certified P.P.M. can sub-contract a part of its operation with another 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.

4.6 Submitting application documents

4.6.1 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 JAS Certification Program.

4.6.2 Categories of certification

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

	ENG_REG_JAS	REV. 04 del 13/02/2025	PAG 6 DI 18
	JAS CERTIFICATION PROGRAM		

4.6.3 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.

4.6.4 Submission of application documents

The applicant should submit the application to CSQA Organic Production 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.

4.6.5 Reception by CSQA Organic Production Office

CSQA shall not refuse application except for the cases below.

- 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
- the applicant whose previous organic certification was cancelled within the past one (1) year; or
- the applicant that is organized by the person who was responsible for cancellation of organic certification within the past one (1) year; or
- the applicant who refuses to conclude “JAS Certification Agreement”;
- the applicant who refuses to pay the fees related to certification services, or has unpaid invoice for the fees of a previous year.

CSQA notify the reason of refusal to the applicant by written communication.

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.

The manuals and procedures of CSQA is written in Italian and translated into English. CSQA can deal with application from foreign applicants in English.

4.7 Initial evaluation by CSQA office and qualified personnel

4.7.1. 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” and , the Quotation Technical Approver (ATM) will send a quotation for JAS certification services to the applicant.

If all necessary documents are not able to be accepted (meaning they are not submitted despite communication) in 90 days, the Scheme Manager may decide cancellation of the evaluation and return application document to the applicant.

An applicant may withdraw its application at any stage of evaluation.

4.7.2 Document Review: Initial evaluation by qualified personnel

A qualified person (technical reviewer) will evaluate the application documents without a delay whether it meets the requirements of applicable standards.

	ENG_REG_JAS	REV. 04 del 13/02/2025	PAG 7 DI 18
	JAS CERTIFICATION PROGRAM		

The documents submitted by the operator must contain internal rules on the following matters (ref. JAS Technical Criteria).

- For Production Process Managers of Organic Plant Products and Organic Feeds (Limited to those that have undergone only the process of preparation or sorting):
 - Matters in regard to obtaining seeds, seedlings, etc. or seed spawn (excluded in cases where organic plants or organic feeds are harvested in the collection areas);
 - Matters concerning the sterilization of seeds in the cases where sprouts are produced in the cultivation facilities (excluded in cases where organic plants or organic feeds are harvested in the collection areas);
 - Matters concerning Manuring Practice, Cultivation Management, Control of noxious animals and plants, General Management, and Management of raising seedlings (excluded in cases where organic plants or organic feeds are harvested in the collection areas);
 - Matters concerning the production machinery and equipment;
 - Matters concerning the management of harvesting, receiving, transportation, sorting, preparation, washing, storing, packaging and other post-harvest and post-receiving processes;
 - Matters concerning the creation of records related to “the production process management or control” as well as the retention period of the relevant records including the supporting documents for such records;
 - Matters concerning the complaints handling;
 - Matters concerning the creation of an annual production plan and the notification of it to the certification bodies;
 - Matters required for the appropriate business activities, such as implementation status confirmation (by the certification bodies) of production processes management or control.
- For Production Process Managers of Organic Livestock Products:
 - Matters concerning the management of livestock barn or poultry house, and open-air free runs (only in the case of raising livestock or poultry);
 - Matters relating to obtaining livestock or poultry;
 - Matters concerning the confirmation of grade labels attached to the livestock or poultry (only in the case of receiving the livestock or poultry, to which grade labels are attached);
 - Matters concerning the individual (or flock/herd) identification of livestock or poultry (limited to the individual identification in the case of raising livestock or poultry);
 - Matters relating to obtaining or producing the feeds (only in the case of raising livestock or poultry);
 - Matters concerning the confirmation of certificates attached to the feed certified by the equivalent countries (limited to the cases where equivalent-country-certified feeds are provided);
 - Matters concerning the feeding (only in the case of raising livestock or poultry);
 - Matters concerning the health management of livestock or poultry;
 - Matters concerning the grazing in the open-air free runs (only in the case of raising livestock or poultry);
 - Matters concerning the surgical procedures for the safety, health, identification and castration of the livestock or poultry (Only in the case of raising livestock or poultry);
 - Matters concerning the extension of day length with artificial lighting (only in the case of raising egg-laying hens);

JAS CERTIFICATION PROGRAM

- Matters concerning the breeding methods (only in the case of breeding livestock or poultry);
- Matters concerning the management of excrement from livestock or poultry;
- Matters concerning the transportation of livestock or poultry (limited to the cases where domestic animals or poultry are transported);
- Matters concerning the milking (limited to the cases where bovine and caprine animals are raised for milk production);
- Matters concerning machinery and equipment used for production (limited to the cases where production is carried out);
- Matters concerning the management of slaughter, dressing, receiving, sorting, preparation, washing, storing, packaging and other post-harvest and other processes;
- Matters concerning the creation of records related to “the production process management or control” as well as the retention period of the relevant records including the supporting documents for such records;
- Matters concerning the complaints handling;
- Matters concerning the creation of an annual production plan and the notification of it to the certification bodies,
- Matters required for the appropriate business activities, such as implementation status confirmation (by the certification bodies) of production processes management or control.
- For Production Process Managers of Organic Feeds (limited to those that have undergone the processes other than preparation or sorting process) and Organic Processed Foods:
 - Matters concerning receiving & storing of ingredients and additives as well as confirmation of grade labelling;
 - Matters concerning the confirmation of certificates attached to the feed certified by equivalent countries only in the cases where Organic Feed (limited to the cases where equivalent-country certified feeds are used as ingredients) is produced;
 - Matters concerning the mixing ratio of ingredients and additives;
 - Matters concerning the management of manufacturing, processing, packaging, storage and other processes;
 - Matters concerning the machinery and equipment used in the process of manufacturing, processing, packaging, storing and other processes;
 - Matters concerning the creation of records related to “the production process management or control” as well as the retention period of the relevant records including the supporting documents for such records;
 - Matters concerning the complaints handling;
 - Matters concerning the creation of an annual production plan and the notification of it to the certification bodies;
 - Matters required for the appropriate business activities, such as implementation status confirmation (by the certification bodies) of production processes management or control.
- For Re-packers of Organic Plant Products, Organic Feeds, Organic Livestock Products, and Organic Processed Foods:
 - Matters related to receiving & storing of organic plant products, organic feeds, organic livestock products, organic processed foods, (hereinafter referred to as “organic foods etc.”);
 - Matters concerning the confirmation of grade labelling of organic foods etc. before re-packing;
 - Matters concerning the re-packing methods;

- Matters concerning the machinery and equipment used in the re-packing process;
- Matters concerning the creation of records related to “the re-packing management” as well as the retention period of the relevant records including the supporting documents for such records;
- Matters concerning the complaints handling;
- Matters required for the appropriate business activities, such as implementation status confirmation of re-packing by the certification bodies.

The documents submitted by the operator must also contain grading rules on the following matters, and those rules must be prepared concretely and systematically.

- Matters concerning the production process inspection;
- Matters concerning the grade labeling;
- Matters concerning the shipment or disposal of the lot after grading;
- Matters concerning the handling of those lots found to be in conformity, after shipment, with:
 - JAS 1605 or JAS 1606 for Production Process Managers of Organic Plant Products and Organic Feeds (limited to those that have undergone only the process of preparation or sorting);
 - JAS 1608 for Production Process Managers of Organic Livestock Products;
 - JAS 1607 or JAS 1606 for Production Process Managers of Organic Feeds (limited to those that have undergone the processes other than preparation or sorting process) and Organic Processed Foods;
 - JAS 1605, JAS 1607, JAS 1608, and JAS 1606 for Re-packers of Organic Plant Products, Organic Feeds, Organic Livestock Products, and Organic Processed Foods.
- Matters concerning the creation and storage of records related to the grading;
- Matters required for the appropriate business activities, such as implementation status confirmation (by the certification bodies) of the grading activities.

These information must be reported within the company management plan and grading manual or equivalent documents.

It will be decided whether an on-site inspection can be done or whether more information is necessary. The office informs the applicant if the result of the first processing is negative.

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.

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.

4.8 Appointing the inspector and assigning the on-site inspection

4.8.1 Planning an inspection

Scheme manager decides assignment of an inspector, inspection schedule, and frequency of inspections.

Refer to CSQA Quality Manual and to IOP035_VOL about qualifications of an inspector, inspection procedures, inspection report, confidentiality, and so forth during on-site inspection.

On-site inspection, including that of subcontracted operation, shall be conducted at least once a year

4.8.2 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 including alcoholic beverage: 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.

4.8.3 Assigning the inspector

Scheme Manager selects an inspector from the list of the JAS qualified inspectors, following the subsequent guidelines:

- 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.

If an assigned inspector finds any conflict of interest with the applicant, the inspector shall excuse him/herself from the assignment.

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.

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 rules:

- The applicant submits to CSQA a written paper to clarify the reasons for the objection;
- 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.

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 IFOAM Norms for Organic Production and Processing. If there is any inappropriate case, condition(s) should be notified to the operator;
- checks the records related to its organic management system;
- observes the surrounding environment of facilities including fields and factories.

4.8.4 Preparation for an inspection

CSQA shall provide to the inspector all information needed and the detailed schedule such as inspection date should be decided between the inspector and the operator.

The inspector reviews the application documents, with particular attention to:

- internal rules, and
- grading rules;

as reported in the management plan and grading manual or equivalent documents.

If it is not the first-time inspection, the inspector should be prepared for checking the relevant comments from the previous inspection.

	ENG_REG_JAS	REV. 04 del 13/02/2025	PAG 11 DI 18
	JAS CERTIFICATION PROGRAM		

4.8.5 On-site inspection

An inspector carries out on-site inspection according to the following procedures.

- 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:
 - Organic products and non-organic products are visually distinguished;
 - An accurate estimated amount of production is recorded and shall be checked against the shipment records;
 - 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.
- 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 inspection it means without any prior notification to the operator.

4.9 Procedures after inspection

The inspector submits the inspection report within ten (10) days from the on-site inspection.

	ENG_REG_JAS	REV. 04 del 13/02/2025	PAG 12 DI 18
	JAS CERTIFICATION PROGRAM		

The “inspection report” includes:

- CSQA inspection checklist;
- inspection memo;
- attachments and photographs/pictures, which are supporting documents.

The inspector may ask the operator to submit additional documents, which are not available or inadequate at the time of inspection.

The inspector includes all the information necessary for certification in the 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.

4.10 Plural inspections within a year

CSQA shall test soil and chemical residue and/or conduct an additional inspection depending on the following 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.

CSQA sees that the operation has a potential risk if the latter falls into the following conditions:

- P.P.M. group is organized with more than thirty (30) farmers;
- P.P.M. who also produces conventional crop (especially in parallel production);
- P.P.M., processor including alcoholic beverage, and/or re-packer who produce, process, or handle and grade many items;
- PPM, processor including alcoholic beverage, Re-packer and Importer who frequently purchase ingredients; P.P.M. (Producer and Processor) who produce or process the products in which people hold a keen interest;
- Operators who were questioned about their certified operations in the past;
- Warehouse or Transportation operator who frequently receives and ships out the products;
- Operators/Certified operations where non-compliances were found at previous inspection;
- Operators/Certified operations who received complaints.

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, the scope of inspection can be limited to a part of operation.

4.11 Certification Committee (CEC)

CEC assesses the conformity of the evaluation, closing the review and decision activity. It can decide the necessity of re-inspection to verify corrective actions.

CEC reviews:

- the application and related documents, with particular attention to internal rules and grading rules as reported in the management plan and grading manual or equivalent documents; 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.

CEC can be composed of one member or, in case of critical NCs, three members or more in odd number.

When CEC decides not to grant certification, it will communicate it to the operator with information on the reason of it.

4.11.1 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 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.

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.

4.11.2 Appeal against a decision

An applicant can make an appeal against the decision made by the CEC. Refer to JAS Certification Agreement for details.

4.12 Agreement after certification

The certified operator must observe what reported in the JAS Certification Agreement.

All of the certified operators shall report to CSQA on the following articles after approval of certification.

4.12.1 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.

CSQA Organic Production Office evaluates a draft of labelling and notifies the result to the Operator.

CSQA Organic Production Office request correction if deficiencies are found.

4.12.2 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.

4.12.3 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.

	ENG_REG_JAS	REV. 04 del 13/02/2025	PAG 14 DI 18
	JAS CERTIFICATION PROGRAM		

Scheme Manager conducts a document review on the changes and addition based on record of past approval and categorize them to:

- 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;
- 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; or
- 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 and make a certification decision in line with JAS Certification Program.

An application may be denied. In that case, CSQA shall inform the result and its reasons to the applicant.

For farmer group certification, when new members are added to the group, 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.

4.12.4 Issue of Transaction Certificate

A certified operator may need Transaction Certificate, which can be requested by written communication, including the information on the products, to CSQA Organic Production Office.

CSQA will issue a Transaction Certificate to the applicant after confirming that the transaction is in line with the certification of the applicant.

4.12.5 Handling and disposal of nonconformity items

When fields, production facilities, raw materials, seeds/seedlings etc becomes nonconforming with Organic JAS Standards, even due to inevitable reasons, these products are considered non-compliant.

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-compliant products must be handled as non-organic products, and the disposing methods and quantities must be recorded.

	ENG_REG_JAS	REV. 04 del 13/02/2025	PAG 15 DI 18
	JAS CERTIFICATION PROGRAM		

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.

4.12.6 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.

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.

4.12.7 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.

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.

4.12.8 Discontinue of the certification

If a certified operator intends not to continue the certification, it must notify CSQA of the discontinuation of grading operation by written communication.

The certified operators must immediately stop using certification documents and return them to CSQA.

CSQA must report it to MAFF and disclose the information of this operator to the public.

4.12.9 Keeping the documents relating to certification

CSQA maintains record of every certified operators and related documents for at least 6 years.

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.

5. SUPERVISION UNDER ORGANIC REGULATIONS

5.1 Reports to the Applicable Authorities

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 though FAMIC in the same way as above mentioned.

	ENG_REG_JAS	REV. 04 del 13/02/2025	PAG 16 DI 18
	JAS CERTIFICATION PROGRAM		

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.

5.2 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 "ク" 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.

6. CSQA POLICIES

6.1 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.

6.2 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.

6.3 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.

6.4 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 Program¹ 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.

6.5 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.

¹ 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

	ENG_REG_JAS	REV. 04 del 13/02/2025	PAG 18 DI 18
	JAS CERTIFICATION PROGRAM		

6.6 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 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.

6.7 Audit by the authority

6.7.1 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.

6.7.2 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.

7. 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