

# Client Update on Recent Changes of JAS Standards

## Contents

A. Changes until 2024 .....	1
B. Changes effective from 31 July 2024 .....	1

## A. Changes made until 2024

- Agricultural PPM (“agricultural Production Process Manager” = clients who are certified for crop production) and/or processing PPM (“processing Production Process Manager” = clients who are certified for food processing) are allowed to repack products of the same product category without being certified as “repacker”. For instance, an agricultural PPM is now allowed to repack agricultural products bought from other suppliers.

However, agricultural PPM cannot repack processed products and processing PPM cannot repack agricultural products. In such cases they still must get a certification as repacker.

- From July 2020, the JAS mark has become mandatory when exporting organic livestock products to Japan.
- USA, Australia, Switzerland, and Canada have equivalence agreements on livestock products with Japan.
- Canada and Taiwan have equivalence agreements on alcoholic beverages with Japan.
- 1) Salt that is used for organic JAS processing may contain other food additives than those listed in Attached Table 1. However, if the food additive not listed in Attached Table 1 used in the salt is also effective in the organic JAS product (e.g. as anti-caking agent), use of such salts is not allowed.  
2) Notwithstanding the above, salt with added flavour enhancer and / or minerals (except natural bittern obtained from seawater or rock salt) cannot be used for processing JAS organic processed foods. “Minerals” mentioned above means such that are generally used for food fortification. (Iodine, Zinc salts, Calcium chloride, Iron(II) chloride, etc.).

**B. Changes which will be effective from July 31, 2024.** (The deletion of 3 inputs from Table 2 of the crop standards will be effective from January 1, 2025.)

### 01. Format change:

The format has been revised significantly based on the ISO formatting guidelines, in order to improve the linkage between JAS and international standards, and to improve the searchability and user-friendliness of standards.

(relevant Standards)

1. JAS 1605, Organic Products of Plant Origin
2. JAS 1606, Organic Processed Foods
3. JAS 1607, Organic Feed
4. JAS 1608, Organic Livestock Products (not covered by CERES accreditation)

## [Change of JAS 1605 (Organic Products of Plant Origin)]

### 01. Revision regarding mushroom cultivation

**Revision of materials that can be used in mushroom cultivation sites:**

- 1) In the cultivation management of mushrooms grown on mushroom bed, "Calcium carbonate" and "Slaked lime" in Table A.1 can be used. Please refer to section 5.8.4 of the standard.
- 2) "Bamboos" and "waste mushroom beds" can be used as raw materials for mushroom beds. Please refer to section 5.8.1 of the standard.

3) The materials that can be used for the mushroom bed have been changed from being limited to "rice bran" to "brans". Please refer to section 3.10 (definition of "Brans") and section 5.8.4 of the standard.

## 02. Revision regarding sprout production

### 2-1 Revision of the materials that can be used for sprout seeds:

- 1) The restriction on hypochlorous acid water stated in Article 4, Paragraph 6 of the old standard (restriction: limited to those obtained by electrolyzing salt solution (limited to those using salt containing no less than 99% sodium chloride)) has been deleted. Please refer to section 5.6.3 of the standard.
- 2) Sodium hypochlorite (obtained by electrolyzing the salt solution) has been added as a new usable material. Please refer to section 5.6.3 of the standard.

### 2-2 Revision of sprout cultivation management:

It is stipulated that sprout should be produced by using water only. The description of culture medium stated in Article 4, Paragraph 8-2-(1)-(b) of the old standard has been deleted. For information about cultivation management at the sprout cultivation sites, please refer to section 5.9 of the standard.

## 03. Regarding special measure in case trace amounts of prohibited substances are mixed into seedling sites:

If prohibited substances flow into seedling sites due to natural disasters or other reasons beyond the responsibility of the certified operator, and the amount is small, it may be considered as not using prohibited materials. Please refer to Q&A 1-9, Answer 4.

The Q&A is currently only available in Japanese. A machine-translated version is:

*Q&A 1-9*

*(Answer): 4. When prohibited substances have been found mixed in the place where seedlings are raised or where seeds or seedlings to be used in fields are grown and the amount of the prohibited substances is deemed to be minute, the use of seeds or seedlings for which prohibited substances have been used is permitted in cases where organic seeds or seedlings are difficult to obtain as stated in 5.4 "Seeds or seedlings to be used in fields," so that the prohibited substances may be regarded as not having been used and the product may be graded.*

## 04. Clarification that seeds/seedlings of varieties improved by irradiation can be used:

The Q&A 10-10 clearly stated that there is no problem to use seeds and seedlings of varieties that have been improved using irradiation and/or varieties that have ancestors that have been improved using irradiation. Please refer to Q&A 10-10.

The Q&A is currently only available in Japanese. A machine-translated version is:

*Q&A 10-10*

*(Question): Under the JAS for organic agricultural products, is it possible to use seeds and seedlings of varieties that have been improved using radiation or varieties that have such ancestors?*

*(Answer): In the Organic Agricultural Standards 5.4.5, the use of seeds produced using recombinant DNA technology is prohibited. On the other hand, breeding through irradiation does not fall under the recombinant DNA technology defined in the Organic Agricultural Standards 3.6, "a technology that creates recombinant DNA molecules by linking DNA through the operation of cutting and recombining using enzymes, etc., and transfers them into living cells and propagates them." Therefore, there is no problem with using seeds of varieties that have been improved using irradiation or varieties that have ancestors that have been improved using irradiation under the Organic Agricultural Standards. We understand that breeding through irradiation is not prohibited in the international organic standards, the Codex guidelines, or the organic regulations of the EU, etc.*

## [Change of JAS 1606 (Organic Processed Foods)]

### 01. Revision regarding raw materials and additives:

- 1) From July 31, 2024, organic JAS algae can also be used as organic raw materials for processed food. Please refer to section 5.1 a) of the standard.
- 2) "Other Organic Processed Foods" is newly added as one of the categories of "Organic Processed Food". Organic Processed Food made mainly from organic algae is included here. Regarding its definition, please refer to section 3.5 of the standard.

Current categories of Organic Processed Food: 1. Organic processed foods of plant origin, 2. Organic processed foods of livestock origin, 3. Organic processed foods of plant and livestock origin, 4. Other Organic Processed Foods, 5. Organic alcohol beverages

- 3) Non-organic raw materials that can be used are changed from "plant, livestock, marine products and their processed products" to "food & beverage". Yeast and lactic acid bacteria belong to this category. Please refer to section 5.1 b) of the standard.

### 02. Regarding inputs that can be used on ingredients before processing:

For organic plant products or organic livestock products used as ingredients, from the time of reception until start of processing, the inputs listed as "Substances for preparation etc. (= inputs for post-harvest handling)" in the JAS for Organic Products of Plant Origin (Table D.1, JAS 1605) or Organic Livestock Products (Table K.1, JAS 1608) can be used. Please refer to section 5.3.2 and 5.3.3 of the standard.

### 03. Regarding showing of ingredients on the JAS label in Japanese:

- 1) Regarding the organic ingredients used, instead of the word "organic (有機/オーガニック)", marks or signs (e.g. \*, #) indicating the relevant ingredients as organic can be used.
- 2) Regarding the ingredients in-conversion used, instead of the word "in-conversion (転換期間中)", marks or signs (e.g. \*, #) indicating "in conversion" can be used.
- 3) In either case, an explanation regarding "Marks or Signs" should be provided, such as follows:

(例)



名 称：有機めんつゆ（転換期間中）  
 原材料名：しょうゆ\*#、  
 しいたけ\*、食塩

（「\*」は「有機」を示す記号です。  
 「#」は「転換期間中」を示す記号です。）

Name: Organic noodle soup (in conversion)  
 Ingredients: Soy sauce\*#,  
 Shiitake mushroom\*, Salt

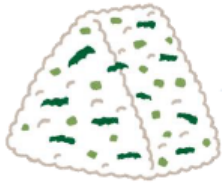
"\*" is the symbol for "organic".  
 "#" is the symbol for "in-conversion".

### 04. Regarding JAS retail label in Japanese of "Other Organic Processed Foods":

The newly established category "Other organic processed foods" are no "specified agricultural and forestry products". Therefore, if its product name is the same as an organic processed food which is a specified agricultural and forestry product, it is necessary to indicate that it is not a specified agricultural and forestry product. Please refer to section 6.1.2 of the standard. An example is shown below.

Organic processed foods which are "Specified agricultural and forestry products": 1. Organic processed foods of plant origin, 2. Organic processed foods of livestock origin, 3. Organic processed foods of plant and livestock origin

(例)



名称：有機おにぎり  
原材料名：有機米、有機ワカメ、塩

当該商品は有機ワカメを6%使用しており、指定農林物資ではありません。

Name: Organic rice balls  
Ingredients: Organic rice, Organic wakame seaweed, Salt

This product uses 6% organic wakame seaweed (\*therefore, this product is no "Organic processed foods of plant origin" but "Other organic processed foods") and is no "specified agricultural and forestry products".

## [Change of JAS 1607 (Organic Feed)]

### 01. Revision regarding ingredients:

Added wood materials to the list of organic ingredients that can be used for organic feed. Along with that, one of the ingredients "Plant products for organic feed" has been changed to "Agricultural and forestry products for organic feed". Please refer to section 5.1 b) of the standard.

### 02. Revision of JAS logo:

The size of the circle in the JAS logo was changed from 30 mm or larger to 5 mm or larger.

## [Technical Criteria of Repacker]

### 01. Special note regarding small operators

In case of small operators, it is permitted for the grading-labeling staff to conduct sales activities, if the following conditions are met:

- (i) The grading SOP stipulates that the grading staff is responsible for confirming through records that the entire process up to shipment (such as reception of products, packing, affixing the grading label, and storage) has been carried out appropriately before shipping the products.
- (ii) The labeling is carried out in accordance with the grading SOP.

Please refer to Q&A 4-8.

The Q&A is currently only available in Japanese. A machine-translated version is:

#### Q&A 4-8

*(Question): The technical standards for the certification of repackers require that the department that affixes the grading labeling has an organization and authority that is substantially independent from the sales department. In cases where we have limited employees and the grading labeling staff has no choice but to carry out sales work, what should we do in such cases?*

*(Answer): 1. When labeling products with grading marks, businesses that do not perform grading (repackers, importers, and foreign grading marking businesses) are required to ensure the objectivity of the grading marks by having a department that affixes grading marks with an organization and authority that is substantially independent from the sales department.  
2. In order to meet this requirement, it is essential to clearly separate the department that affixes grading marks from the sales department and to have a system in which there is no overlap in the personnel. On the other hand, this requirement requires "substantial" independence from the sales department. Even if this is difficult for a repacker, importer or foreign grading company because they have a limited number of employees, if the objectivity of the grading is guaranteed by the following measures: (i) the grading regulations stipulate that the grading officer is responsible for confirming through records that the entire process up to shipment, such as receipt of the agricultural and forestry products, packing, affixing the grading label, and storage, has been carried out appropriately before shipping the agricultural and forestry products bearing the grading label, and (ii) the grading is carried out in accordance with the provisions of (i), then the department that affixes grading labels can be deemed to have an organization and authority that is substantially independent from the sales department.*

## [Revision of Tables of JAS Standards]

### JAS 1605 (Organic Products of Plant Origin)

Table B.1 - Agricultural chemicals

	name	comment
<b>added</b>	Ethylene	Limited to use for the purpose of inducing flowering in pineapple.
	Metaldehyde (solid blocks)	Limited to the use in insect traps.
	Shiitake mushroom liquid extract water-soluble powders	
	Kasugamycin liquid agent	
	Kasugamycin powder material	
	Kasugamycin water-soluble powders	
	Kasugamycin granule	
	Other agricultural chemicals	Limited to only those that contain two or more active substances contained in any other agricultural chemical listed in Table B.1  (Such as Sulfur and copper wettable powder, Sodium hydrogen carbonate and copper wettable powder, fatty acid glyceride and Spinosad wettable powder)
<b>deleted</b>	Chlorella extract liquid	<b>It will be deleted on January 1, 2025.</b>
	Wax wettable powder	<b>It will be deleted on January 1, 2025.</b>
	Diatomite powder	<b>It will be deleted on January 1, 2025.</b>
	Sulfur and copper wettable powder	Mixtures have been removed from the table as they will no longer be listed individually.
	Sodium hydrogen carbonate and copper wettable powder	
	Biological pesticides such as natural enemies and copper wettable powder	

Table D.1 - Substances for preparation etc. (= Substance for post-harvest handling)

<b>condition for use changed</b>	Hypochlorous acid water	*Restriction (Those obtained by electrolyzing salt solution) has been removed.
<b>added</b>	Sodium hypochlorite	Limited to those obtained by electrolyzing salt solution (limited to those using salt containing no less than 99% sodium chloride.)
	Calcium carbonate	
	Calcium hydroxide	

### JAS 1606 (Organic Processed Foods)

Table A.1 - Additives

	name	comment
<b>condition for use changed</b>	Lactic Acid (270)	Add the case of use for processed foods of plant origin.
	Sulfuric Acid (513)	Add the case of use as pH adjuster for processed algae products.
	Sodium Hydroxide (524)	Add the case of use as pH adjuster for processed algae products and the case of use in the production of edible oils and fats.
	Sodium Hypochlorite	Add the case of use for processed foods of plant origin (limited to the use of Hypochlorous Acid Water produced by electrolyzing salt water (limited to the use of salt containing 99% or more Sodium Chloride))
	Hypochlorous Acid Water	*Restriction (limited to the use of Hypochlorous Acid Water produced by electrolyzing salt water (limited to the use of salt containing 99% or more Sodium Chloride)) has been removed.
	Ozone	Add the case of use for disinfecting processed meat products.