

Transitional measure stipulated in Clause 17 of JBA Traceability Audit System Practice Regulations
(Traceability on the inventory down and feathers purchased in the past)

1. Intended entity of document preparation shall comply with the following requirements to be benefited from the transitional measure only for the down and feather materials of down and feather bedding goods showing the Country of Origin.
 - a) For the down and feathers in inventory which were in purchase agreement during the period from April 1st 2017 to the enforcement date of JBA Traceability Audit System Practice Regulations, the intended entity of document preparation shall retain the documents stipulated in 2017-2018 Fall and Winter Traceability confirmation documents and records (Chart 1) "Traceability confirmation documents necessary for the description of production region of raw material down and feathers, and glossary of terms and definitions for raw materials of down and feather products (2017 version)" Intended entity of document preparation shall obtain those documents specified in parentheses in Chart 1 whenever available, but may show the Country of Origin with self-responsibly when those documents are difficult to obtain.
 - b) For the down and feathers in inventory which were in purchase agreement before March 31st, 2017, "Import Declaration", "Bill of Lading" and "Veterinary Certificate" could be excluded from the documents to be retained in Chart 1. In case a document equivalent to any of the documents required in Chart 1 available, the said document can substitute for the document in Chart 1.
 - c) Intended entity of document preparation shall collect and retain the required documents in a) or b) above on purchased down and feather materials or on those filled in down and feather bedding goods, and shall make traceability of the down and feathers in inventory correlated with the documents. The trace method shall be established by the internal standards and executed accordingly.
2. According to the transitional measure, the following items will be exempted from the requirements for the intended entity of document preparation stipulated in Clause 11 of "JBA Traceability Audit System Practice Regulations".
 - a) Records regarding items exhibited on down and feather bedding goods set in the Clause 11.2.1
 - b) Structure of traceability in the Clause 11.2.2a)
 - c) Selecting suppliers in the Clause 11.2.2d)
3. The Audit Institution shall investigate down and feathers in inventory of the intended entity of document preparation to distinguish down and feathers applicable to the transitional measure from those not, and shall confirm that the down and feathers under the transitional measure conform the requirements in Clause 1 above. The following information on down and feather materials shall be recorded for the down and feathers applicable to the transitional measure. Except for the exempted items in Clause 2 above, the Audit Institution shall confirm the requirements for the intended entity of document preparation stipulated in Clause 11 of "JBA Traceability Audit System Practice Regulations" based on the documents and records set in Chart 1 which shall be kept by the intended entity of document preparation.
 - a) Date of agreement of purchase (month, day, year)
 - b) Appellation of origin (Country of Origin)
 - c) Breeding, picking method (mother, harvest, etc.)
 - d) Genus and species of birds
 - e) Mixing ratio (down % / feathers %)

f) Amount of down and feathers in inventory under the transitional measure

4. At traceability surveillance audit, the Audit Institution shall bring the documents and records at the time of the initial audit or the previous surveillance audit to examine consistency between the current amount in inventory and the amount used. The documents and records in Clause 3 shall be revised at every surveillance audit.

Chart 1 2017-2018 Fall and Winter Traceability confirmation documents and records

Procurement Classification		Direct Import (in-house processing) Importing raw materials directly from the Country of Origin, and processing down & feathers in-house	Direct Import (processing in the Country of Origin) Importing washed down & feathers processed in the Country of Origin	Direct Import (outsourced processing) Importing raw materials directly from the Country of Origin, and outsourcing processing of down & feathers	Indirect Import (processing in third country) Importing processed down & feathers from the Country of Origin via a processing country
Supply Chain		(A) → (C)	(A) → (C)	(A) → (C)	(A) → (B) → (C)
Confirmation Documents of	(A) Country of Origin	* Certificate of Origin * Invoice * Packing List * Veterinary Certificate * Bill of Lading * (Transfer Record) *2	* Certificate of Origin * Invoice * Packing List * Veterinary Certificate * Bill of Lading * (Processing Record) *1 * (Transfer Record) *2	* Certificate of Origin * Invoice * Packing List * Veterinary Certificate * Bill of Lading * (Transfer Record) *2	* Certificate of Origin * Invoice * Packing List * Veterinary Certificate * Bill of Lading *(Transfer Record) *2
	(B) Processing country				* Import Declaration from a processing country * Record of processing down & feathers in a processing country * Invoice from a processing country * Packing List from a processing country * Bill of Lading from a processing country
	(C) Japan	* Import Declaration * Transfer record of imported raw materials * Record of processing down & feathers * Filling record * (Records of incoming and outgoing deliveries from/to outsourced contractor in cases the filling is outsourced.)	* Import Declaration * Transfer record of imported raw materials * Filling record * (Records of incoming and outgoing deliveries from/to outsourced contractor in cases the filling is outsourced.)	* Import Declaration * Transfer record of imported raw materials * Records of incoming and outgoing deliveries from/to processor * Record of processing down & feathers * Filling record * (Records of incoming and outgoing deliveries from/to outsourced contractor in cases the filling is outsourced.)	* Import Declaration * Transfer record of imported raw materials * Filling record * (Records of incoming and outgoing deliveries from/to outsourced contractor in cases the filling is outsourced.)

*1 Processing Record shows the production records of the processed raw materials in the Country of Origin. Necessary confirmation for description of the raw material information must be available.

*2 Transfer Record means, for example, records of raw materials transferred from France to Germany for processing or other purposes. Necessary confirmation for description of the raw material information must be available.

(Notes : this English version shall be solely used as reference material to aid in the understanding of the Code of Conduct originally written in Japanese. Only the original Japanese version is valid and shall apply.)

Copyright © JBA 2018. All rights reserved.

Reproducing or copying this document, in whole or in part, without prior written consent of JBA is strictly prohibited.

Copyright © JBA 2018