

# **JBA Traceability Audit Standards**

Established on December 1, 2018

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Issued by : Japan Bedding Goods Association (JBA)

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

## JBA Traceability Audit Standards

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## 1. Objective

JBA Traceability Audit Standards (hereinafter referred to as “this Audit Standards”) stipulates requisites for a proper implementation of a traceability audit (hereinafter referred to as “the Audit”) on an intended entity of document preparation by a third-party audit institution (hereinafter referred to as “the Audit Institution”), for the purpose of securing the credibility of JBA Traceability Audit System (hereinafter referred to as “J-TAS”).

## 2. Definitions

Main terms and definitions used in this Audit Standards are based on Clause 4 in JBA Traceability Audit System Practice Regulations.

## 3. Scope of application

### 3.1 Applicable intended entities of document preparation

This Audit Standards shall apply to the following intended entity of document preparation willing to receive an approval of J-TAS Label.

- a) Procurement trader of raw materials (in country of origin)
- b) Down and feather processor (in processing country)
- c) Importer (in Japan)
- d) Production management of down and feathers (in Japan)
- e) Production management of down and feather products (in Japan)
- f) Labeler (in Japan)

### 3.2 Applicable down and feathers

This Audit Standards shall apply to down and feathers (excluding used or recycled down and feathers, as well as down and feathers without description of goose or duck) with the following a) and c) informations on down and feather materials, and to down and feather bedding goods which down and feathers are filled in Japan. In addition, J-TAS may also be applied to down and feather materials with the following b) Information.

- a) Appellation of origin (Country of Origin)
- b) Breeding and picking methods (Mother, Harvest, etc.)
- c) Genera or species of birds

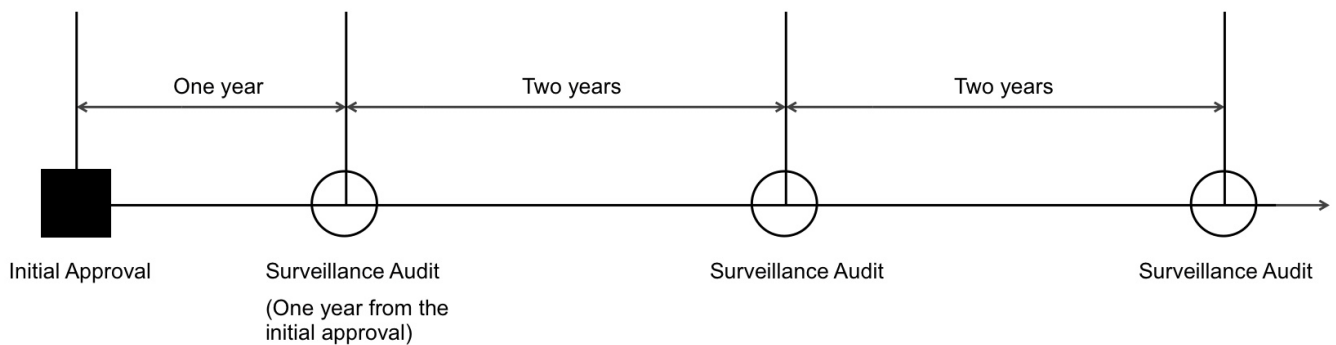
## 4. Audit formalities

### 4.1 The Audit

The Audit Institution conducts the following onsite audit on the intended entity of document preparation who applies for the Audit (hereinafter referred to as “the Applicant”).

- a) Traceability initial audit
- b) Traceability surveillance audit (at one year from an initial approval upon audit and every other year thereafter)
- c) Traceability extraordinary audit (when necessary)

Drawing 1. Frequency of Traceability surveillance audit



Production management of down and feathers 3.1 d) above may omit inputs of the shipping of down and feathers to TC System by accepting the traceability surveillance audit annually. Procurement trader of raw materials (in country of origin) or down and feather processor (in processing country) may undergo on-site audit and remote audit (e.g. by Skype) alternately. For example, initial approval (on-site) → surveillance audit (remote) → surveillance audit (on-site) → surveillance audit (remote).

#### 4.1.1 Application of the Audit

The Audit Institution shall accept an application of the Audit with the following application form and accompanying documents. The cost of audit shall be borne by the applicant.

- a) An application form
- b) Accompanying documents
  - 1) Outline and history of company
  - 2) A chart of company structure and personnel positioning (including responsible person)
  - 3) Lists of internal documents and records relevant to J-TAS
  - 4) Outline of internal management of documents and records relevant to J-TAS
  - 5) Outline of the structure of traceability
  - 6) Illustrated outline of process (flowchart and other related references)
  - 7) Sales quantity of down and feather materials and/or down and feather bedding goods during last six (6) months
  - 8) Quantity of the down and feathers in inventory that is applicable to the transitional measure stipulated in Clause 17 of JBA Traceability Audit System Practice Regulations
  - 9) A list of suppliers of down and feathers and/or down and feather bedding goods
  - 10) Sample of the description of down and feathers and/or down and feather bedding goods
  - 11) A copy of the letter of commitment vowing to observe JBA Traceability Code of Conduct (latest version)

#### 4.1.2 Audit number for applicants

The Audit Institution shall issue an audit number with respect to each application of the Audit.

#### 4.1.3 Business facilities subject to be audited

The Audit Institution shall conduct an on-site audit on business facilities of the Applicant. In case there are more than one business facility, all the business facilities of the intended entity of document preparation listed in Clause 3.1 excluding authorized J-TAS label companies (hereinafter referred to as “the Authorized Labelling Company”) shall be audited.

#### 4.1.4 Audit items

The Audit Institution shall conduct the Audit on the audit items of the intended entity of document preparation listed in Chart 1 below, according to the audit procedures stipulated in Clause 5.

Chart 1 : Requirements of intended entity of document preparation

		Requirements of each intended entity of document preparation			
		11.1 Pledge	11.2 Traceability	11.3 Raw material description	11.4 Product description
Intended entity of document preparation	Procurement trader of raw materials (Country of origin)	•	•	•	
	Down and feather processor (Processing country)	•	•	•	
	Importer (Japan)	•	•	•	
	Production management of down/feathers (Japan)	•	•	•	
	Production management of down/feather products (Japan)	•	•		
	Labeler (Japan)	•	•		•

#### 4.1.5 Evaluation of audit results

The Audit Institution shall assess compliance status of the requirements imposed on each intended entity of document preparation stipulated in Clause 11 of JBA Traceability Audit System Practice Regulations and grade pass or fail on each audit item set in force in Clause 4.1.4 as shown in Chart 2. In the event that any of the audit items is graded as fail, the Audit Institution gives instruction to the applicant to report corrective actions within three (3) months and shall implement the on-site audit on the facility that remedied the failed item. In case that the magnitude of fail grading is minor one, its remedy could be confirmed and approved by document without having the on-site audit.

Chart 2 : Grading by audit

Audit Items	Required Items	Grading
5.1 Pledge	a) Pledge (Clause 5.1)	Pass or Fail
5.2 Traceability	b) Records regarding items exhibited on down and feather bedding goods (Clause 5.2.1)	Pass or Fail
	c) Framework of traceability (Clause 5.2.2)	Pass or Fail
	d) Management of weight of down and feathers (Clause 5.2.3)	Pass or Fail
	e) Management of inventory of down and feathers and/or down and feather bedding goods (Clause 5.2.4)	Pass or Fail
	f) Selection of supplier of down and feather materials (Clause 5.2.5)	Pass or Fail
	g) Management of records (Clause 5.2.6)	Pass or Fail
	e) Management of documents (Clause 5.2.7)	Pass or Fail
5.3 Material description	i) Description of material (Clause 5.3)	Pass or Fail
5.4 Product description	k) Description of products (Clause 5.4)	Pass or Fail

#### 4.1.6 Audit report

The Audit Institution issues two copies of audit report to the Applicant conveying the evaluation of the Audit as set in Clause 4.1.5. The Applicant shall submit one copy of the audit report to J-TAS Committee.

The audit report shall include the following items.

- a) Information of the Applicant (company name and address, J-TAS Membership number, audit number, type of intended entity by J-TAS)
- b) Venue audited, date, period of validity of the audit report
- c) Audit items (required items) and evaluation of each
- d) Remarks and others

#### 4.1.7 Extraordinary audit

In case that J-TAS Committee deems an intended entity of document preparation to fall in any of the following items, the Audit Institute shall conduct an extraordinary audit on the intended entity of document preparation.

- a) The intended entity of document preparation no longer satisfies the requirements stipulated in Clause 11 of JBA Traceability Audit System Practice Regulations by changing its management structure set in Clause 10.1 b) of the same.
- b) The intended entity of document preparation no longer satisfies the requirements stipulated in Clause 11 of JBA Traceability Audit System Practice Regulations due to revision of J-TAS documents.
- c) In the event the J-TAS Committee receives a petition that the intended entity of document preparation fails to satisfy any of the required items by Clause 11 of JBA Traceability Audit System Practice Regulations and the J-TAS Committee recognizes a high probability of the case.

- d) In the event that the sampling test reveals any of the requirements stipulated in Clause 11 of JBA Traceability Audit System Practice Regulations is not satisfied.
- e) When J-TAS Committee determines a need to conduct a traceability extraordinary audit.

## 5. Audit procedures

For the purpose of evaluation of the audit items, the Audit Institution shall conduct the Audit pursuant to the standards provided in Clauses 5.1 through 5.4 below. In the event that the Audit Institution conducts the Audit on the weight of down and feathers, non-J-TAS down and feathers shall be also audited to assess the presence of immixture of down and feathers.

### 5.1 Pledge criteria

- a) A letter of commitment to observe JBA Traceability Code of Conduct
- b) The latest version of the following J-TAS documents are in hand
  - 1) JBA Traceability Audit System Practice Regulations
  - 2) JBA Traceability Code of Conduct
  - 3) JBA Traceability Audit System Standards
  - 4) J-TAS Provisions on Admission
  - 5) other documents required by J-TAS Committee
- c) Management of the J-TAS documents specified in a) and b) above is stipulated by company regulations.

### 5.2 Traceability criteria

#### 5.2.1 Management of records regarding items exhibited on down and feather bedding goods

Records in response to each exhibited item on down and feather bedding goods as specified in Chart 3 shall be made available.

Chart 3 : Records regarding exhibited items

Exhibited Items		Records (*a)
Items to be exhibited	a) Country of origin	* Document bearing an appellation of origin (Certificate of origin. When name of farming region is used, the documents containing the name of region should be included) and/or production record
	b) Breeding and picking methods	* Certificate showing breeding / picking method (*b) (One of the following options: Purchase record from mother farmer, Certificate issued by an official organization, Veterinary certificate, Invoice, Certificate of a seller in the country of origin)
	c) Genera or species of bird Goose	* Record of bird species identification testing method by IDFA
	Others (e.g. Eiderdown)	* Certificate showing species or genus of birds (One of the following options: Veterinary certificate, Invoice, Certificate of a seller in the country of origin)
Note: (*a) The intended entity of document preparation shall compile reliable records responsibly. (*b) No abbreviation of mother goose, such as "MH", is allowed.		

## 5.2.2 Framework of traceability

With regard to transfer records, import / export records and production records, the intended entity of document preparation shall structure and operate traceability by company regulations which enables to assess to the records in Clause 5.2.1. Required items to be confirmed by each intended entity of document preparation are listed in Clauses 5.2.2.1 through 5.2.2.6 below. The intended entity of document preparation shall develop and ensure a traceability system at its own responsibility.

### 5.2.2.1 Procurement trader of raw materials

- a) the records listed in 5.2.1 shall be retained.
- b) the records required by the intended entity of document preparation in addition to the records listed in the Attached drawing 4 in JBA Traceability Audit System Practice Regulations shall be prepared and pertained.
- c) down and feathers shall be distinguished by the identification description attached on the bales containing down and feathers.
- d) the down and feathers subject to this Audit Standards, the down and feathers in inventory that is applicable to the transitional measure stipulated in Clause 17 of JBA Traceability Audit System Practice Regulations, recycled (used) or other down and feathers shall be distinguished from each other.
- e) all the transaction informations of down and feather materials applicable to this Audit Standards must be entered into TC System and approved.
- f) procured down and feathers shall be accompanied by TC Certificate, and the records to trace the link between each license number in TC Certificates from purchase to shipping shall be made available.
- g) necessary records (TC Certificate and others) for the intended entity of document preparation of the next phase of trade and the way to pass those records over shall be defined.
- h) When there is refining processes like washing, down and feathers in each process shall be well distinguished. Before processing different material (e.g. appellation of origin in Clause 3.2) from the previous one, machinery and equipments shall be cleaned.
- i) down and feathers under transportation shall be distinguished and managed.

### 5.2.2.2 Down and feather processor

- a) the records required by the intended entity of document preparation in addition to the records listed in the Attached drawing 4 in JBA Traceability Audit System Practice Regulations shall be clarified.
- b) down and feathers shall be distinguished by the identification description attached on the bales containing down and feathers.
- c) the down and feathers subject to this Audit Standards, the down and feathers in inventory that is applicable to the transitional measure stipulated in Clause 17 of JBA Traceability Audit



System Practice Regulations, recycled (used) or other down and feathers shall be distinguished from each other.

- d) down and feathers in each refining process shall be well distinguished. Before processing different material (e.g. appellation of origin in Clause 3.2) from the previous one, machinery and equipments shall be cleaned.
- e) all the transaction informations of down and feather materials applicable to this Audit Standards shall be entered into TC System and approved.
- f) Procured down and feathers must be of J-TAS, and the records to trace the link between each approval number in TC Certificate from purchase to shipping shall be made available.
- g) necessary records (TC Certificate and others) for the intended entity of document preparation of the next phase of trade and the way to pass those records over shall be defined.

#### 5.2.2.3 Importer

- a) the records required by the intended entity of document preparation in addition to the records listed in the Attached drawing 4 in JBA Traceability Audit System Practice Regulations shall be clarified.
- b) down and feathers shall be distinguished by the identification description attached on the bales containing down and feathers.
- c) the down and feathers subject to this Audit Standards, the down and feathers in inventory that is applicable to the transitional measure stipulated in Clause 17 of JBA Traceability Audit System Practice Regulations, recycled (used) or other down and feathers shall be distinguished from each other.
- d) all the transaction informations of down and feather materials applicable to this Audit Standards shall be entered into TC System.
- e) procured down and feathers must be of J-TAS. The records to trace down and feathers from the purchase (the license number in TC Certificate) to the shipping (lot number and others) shall be made available.
- f) necessary records (TC Certificate and others) for the intended entity of document preparation of the next phase of trade and the way to pass those records over shall be clearly defined.

#### 5.2.2.4 Production management of down and feathers

- a) the records required by the intended entity of document preparation in addition to the records listed in the Attached drawing 4 in JBA Traceability Audit System Practice Regulations shall be clarified.
- b) down and feathers shall be distinguished by the identification description attached on the bales containing down and feathers.
- c) the down and feathers subject to this Audit Standards, the down and feathers in inventory that is applicable to the transitional measure stipulated in Clause 17 of JBA Traceability Audit System Practice Regulations, recycled (used) or other down and feathers shall be distinguished from each other.

- d) all the transaction informations of down and feather materials applicable to this Audit Standards shall be entered into TC System. Inputs to TC System may be omitted by accepting the traceability surveillance audit annually.
- e) procured down and feathers must be of J-TAS. The record to trace down and feathers from the purchase (the license number in TC Certificate) to the shipping (processing lots, production number, etc.) shall be made available.
- f) The shipped down and feathers above shall be linked to the TC Certificate from the Importer.
- g) necessary records (TC Certificate of down and feather materials from the Importer, identification description of J-TAS down and feathers, etc.) for the intended entity of document preparation of the next phase of trade and the way to pass those records over shall be clearly defined.
- h) When refining process is outsourced, processing records for each lot prepared by the outsourced factory shall be made available. The processing records may be stored at the outsourced factory insofar as the records are managed and kept ready to be submitted without delay at all times.
- i) the list of criteria in selecting outsourced factory, details of outsourcing, outsourcing procedure, production records shall be clearly defined and retained.
- j) an educational training on J-TAS shall be given to outsourced factories and the training records shall be retained.

#### 5.2.2.5 Production management of down and feather bedding goods

- a) the records required by the intended entity of document preparation in addition to the records listed in the Attached drawing 4 in JBA Traceability Audit System Practice Regulations shall be clarified.
- b) down and feathers shall be distinguished by the identification description attached on the bales containing down and feathers.
- c) the down and feathers subject to this Audit Standards, the down and feathers in inventory that is applicable to the transitional measure stipulated in Clause 17 of JBA Traceability Audit System Practice Regulations, recycled (used) or other down and feathers shall be distinguished from each other.
- d) procured down and feathers shall be of J-TAS, and the records which enable to trace from the purchased down and feathers (processing lots, production number, etc.) to the serial number of J-TAS Label affixed to down and feather bedding goods shall be made available for submitting.
- e) The down and feathers filled in down and feather bedding goods to be shipped out above shall be linked to the TC Certificate from the Importer.
- f) informations (TC Certificate of down and feathers from the Importer, serial number of J-TAS Label, etc.) necessary for the intended entity of document preparation of the next phase of trade and the way to pass those records over shall be defined.
- g) When filling process of down and feather is outsourced, filling records by the outsourced factory shall be made available. The filling records may be stored at the outsourced factory insofar as the records are managed and kept ready to be submitted without delay at all times.

- h) criteria in selecting outsourced factory, details of outsourcing, outsourcing procedure, production records shall be clearly defined and retained.
- i) an educational training on J-TAS shall be given to outsourced factories and the training records shall be retained.

#### 5.2.2.6 Labeler

- a) the records required by the intended entity of document preparation in addition to the records listed in the Attached drawing 4 in JBA Traceability Audit System Practice Regulations shall be clarified.
- b) down and feather bedding goods shall be distinguished by each lot.
- c) down and feather bedding goods applicable to this Audit Standards shall be distinguished from other down and feather bedding goods.
- d) TC Certificate of down and feathers from the Importer and J-TAS Label on down and feather bedding goods shall be linked. The Labeler is not required to retain each and every import/export document listed in the Attached drawing 4 of JBA Traceability Audit System Practice Regulations as the Production management of down and feather bedding goods from which the Labeler purchases the down and feather bedding goods is the Authorized Labelling Company. However, TC Certificate of down and feathers from the Importer shall be retained.

#### 5.2.3 Management of weight of down and feathers

The intended entity of document preparation shall stipulate and practice a management method in the company regulations to perceive the weight of down and feathers at each stage from purchase to shipping. Required items to be confirmed by each intended entity of document preparation are listed in Clauses 5.2.3.1 through 5.2.3.6 below. The intended entity of document preparation shall also manage the weight of non-J-TAS down and feathers to avoid immixture and/or dissipation of the down and feathers.

The intended entity of document preparation shall perceive and manage the quantitative limit at shipping and usage of down and feathers in each process, e.g. refining or filling.

##### 5.2.3.1 Procurement trader of raw materials

- a) the record of the weight of down and feathers at receiving shall be retained.
- b) the record of measurement of the weight of down and feathers to be shipped shall be retained.
- c) the weight shall be described in common measurement units either by measured value or by official moisture regain.
- d) to perceive immixture or loss of down and feathers, difference in weight between the points of receiving and shipping shall be calculated and recorded with respect to each particular lot. In the event that there is a difference between the two, the cause of increase or decrease must have been identified.
- e) When there are processes like refining of down and feathers, the records of the weight of down and feathers before and after each process shall be retained.

- f) When there are processes like refining of down and feathers, the records of difference in weight by each lot of down and feathers before and after each process shall be retained in order to avoid immixture or loss of down and feathers, and in the event that there is a difference between those, the cause of increase or decrease must have been identified.

#### 5.2.3.2 Down and feather processor

- a) the record of the weight of down and feathers at receiving shall be retained
- b) at processes like refining of down and feathers, the records of the weight of down and feathers before and after each process shall be retained.
- c) the record of the weight of down and feathers to be shipped shall be retained.
- d) the weight shall be described in common measurement units either by measured value or by official moisture regain.
- e) to perceive immixture or loss of down and feathers, difference in weight of down and feather between the points of receiving and shipping (difference in weight before and after processes like refining) shall be calculated and recorded by each particular lot. In the event that there is a difference between the two, the cause of increase or decrease must have been identified.

#### 5.2.3.3 Importer

- a) to perceive immixture or loss of down and feathers, difference in weight between the points of receiving and shipping shall be calculated and recorded by each particular lot. In the event that there is a difference between the two, the cause of increase or decrease must have been identified.
- b) In the event of repairing bales, the said bales and the reasons for repairing shall be recorded.

#### 5.2.3.4 Production management of down and feathers

- a) the record of the weight of down and feathers at receiving shall be retained.
- b) at processes like refining of down and feathers, the records of the weight of down and feathers after each process shall be retained.
- c) the record of the weight of down and feathers to be shipped shall be retained.
- d) the weight shall be described in common measurement units either by measured value or by official moisture regain.
- e) to perceive immixture or loss of down and feathers, difference in weight of down and feather between the points of receiving and shipping (difference in weight before and after processes like refining) shall be calculated and recorded by each particular lot. In the event that there is a difference between the two, the cause of increase or decrease must have been identified.
- f) When refining process of down and feather is outsourced, the records of the weight of down and feathers after each outsourcing shall be retained.

#### 5.2.3.5 Production management of down and feather bedding goods

- a) the record of the weight of down and feathers at receiving shall be retained.

- b) at filling process of down and feathers, the records of the weight of down and feathers of down and feather bedding goods shall be retained.
- c) the weight shall be described in common measurement units either by measured value or by official moisture regain.
- d) to perceive immixture or loss of down and feathers, difference in weight of between down and feathers at the point of receiving and those filled in products for shipping shall be properly calculated and recorded with respect to each particular lot. In the event that there is a difference between the two, the cause of increase or decrease must have been identified.
- e) When filling process of down and feather is outsourced, the records of the weight of down and feathers after each outsourcing shall be retained.

#### 5.2.3.6 Labeler

The Labeler is exempt from the management of the weight of down and feathers, as immixture and/or dissipation of the down and feathers does not occur in handling the ready-made down and feather bedding goods.

#### 5.2.4 Management of inventory of down and feathers and/or down and feather bedding goods

The intended entity of document preparation shall stipulate it in the company regulations to manage an inventory of down and feather materials and/or down and feather bedding goods by an inventory ledger. Number of bales, weight of down and feathers, quantity of products, etc., in addition to such information of down and feather materials as date of purchase agreement, Country of Origin, breeding and picking method, genera or species of bird, composition mixing ratio, shall be recorded. Note, however, that management of the down and feather materials which fall under the category of the transitory measure in Clause 17 of JBA Traceability Audit System Practice Regulations shall be carried out according to the provisions set force in separately provided "Transitional measure stipulated in Clause 17 of JBA Traceability Audit System Practice Regulations".

#### 5.2.5 Selection of supplier of down and feather materials

The intended entity of document preparation shall stipulate it in the company regulations to select the Authorized Labelling Company as its suppliers and shall practice as stipulated.

#### 5.2.6 Management of records

A management method for identification, storage, preservation, searching, retention period (all records must be kept for ten (10) years) and discarding of the records relevant to J-TAS shall be established.

#### 5.2.7 Management of documents

A method of establishment and revision of internal documents relating to J-TAS and a management method of the latest versions of those, and when necessary, a management method of external documents (JIS, etc.) shall be established.

### 5.3 Material description criteria

- a) A description of down and feather materials shall be done according to the manner stipulated in Clause 11.3 of JBA Traceability Audit System Practice Regulations, and shall be properly affixed on every unit of bale, written in swing tags and/or leaflets.
- b) When applicable, the management method of storing and avoiding mis-use of the Logo mark on down and feather raw materials shall be stipulated in the internal standards and practiced accordingly.

### 5.4 Product description criteria

- a) descriptions of down and feather materials as well as quality of those shall be done according to the manner stipulated in Clause 11.4 of JBA Traceability Audit System Practice Regulations, and shall be described properly on down and feather bedding goods, swing tags and leaflets.
- b) It shall be stated by the pledge in Clause 5.1 to observe laws and regulations below.
  - 1) Act against Unfair Competition
  - 2) Act against Unjustifiable Premiums and Misleading Representations
  - 3) JBA Quality Labelling Regulation on comforters, when necessary
  - 4) JDFA Quality Labelling Regulation, when necessary
  - 5) Other laws and industrial standards, when necessary
- c) J-TAS Label shall be sewn onto down and feather bedding goods. The Label management procedure shall be stipulated in the internal standards in order to enable to perceive in-and-out of the Label, to avoid mis-use of the Label on down and feather bedding goods and others.

### 6. Assessment of audit results

J-TAS Committee shall deliberate the audit result in the audit report (Clause 4.1.6) submitted from the Applicant and assess conformity with required items for the intended entity of document preparation by Clause 11 of JBA Traceability Audit System Practice Regulations. When assessing, J-TAS Committee may seek the opinion of the Audit Institution as needed.

J-TAS Committee informs the Applicant the judgement of “pass” or “fail”.

### 7. Approval of J-TAS Labeling Company and publication

In case the assessment result is “pass” in Clause 6 above, J-TAS Committee approves the Applicant as J-TAS Labeling Company and issues the certificate of the Authorized Labeling Company to the Applicant.

J-TAS Committee shall announce officially the Applicant as an Authorized Labeling Company on the website of JBA.

### 8. Statement of disagreement or complaint

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Unsatisfied Applicant with the audit report or with the assessment on the audit result may file a petition of dissatisfaction or complaint to the institutions in Chart 5 below.

Chart 5: Institutions for petition of dissatisfaction or complaint

Items	Institution
Audit report	Secretariat of the audit institution
Judgement on audit result	J-TAS Committee

#### 9. Enforcement date

This Audit Standards is enforced on December 1, 2018.

This Audit Standards is revised and enforced on August 1, 2020