J-TAS Provisions on Admission

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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 Provisions on Admission written in Japanese. Only the original Japanese version is valid and shall apply.)

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J-TAS Provisions on Admission

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J-TAS Provisions on Admission

1. Objective

J-TAS Provisions on Admission (hereinafter referred to as “this Provisions on Admission “) stipulates proceedings by J-TAS Committee (hereinafter referred to as “the Committee”), that are referred in Clause 6.1.b) of JBA Traceability Audit Practice Regulations, as to admission to J-TAS Association of an intended entity of document preparation who intends to enroll in J-TAS Association.

2. Definitions

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

3. Application for membership.

3.1 Receipt of application

J-TAS Secretariat (hereinafter referred to as “the Secretariat”) accepts an application with an application form (Form 1 - Provisions on Admission) and a letter of commitment (Form 2 - Provisions on Admission) from the intended entity of document preparation (see Attachment 1) stipulated in Clause 9.1 of JBA Traceability Audit System Practice Regulations. An international global firm that operates across multiple countries shall not be treated as a single intended entity of document preparation, but shall apply for J-TAS membership in each country.

3.2 Confirmation of submitted documents

The Secretariat shall inspect the submitted forms and instruct the applicant to rectify the flaw and resubmit the forms when necessary.

3.3 Preparation of qualification examination

The Secretariat shall confirm company information written in the application form, and collect further information from the company’s website or other sources if needed.

4. Examination of admission

4.1 Documents for examination of admission

The Committee shall conduct admission examination based on the following documents

a) the application form and the letter of commitment stipulated in Clause 3.1
b) Company information as set forth in Clause 3.3

4.2 Criteria for admission

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The Committee shall examine the eligibility of the applicant for admission with the documents in Clause 4.1

a) the applicant must be the intended entity of document preparation
b) the applicant must have submitted a letter of commitment
c) the applicant must be those who were punished with that heavier than a fine and two years have passed from the completion of the execution of the punishment or from the date when it became clear that no more punishment would be executed
d) the applicant must be those who were expelled from J-TAS Association and two years have passed from the date of the expulsion

4.3 Approval of admission

The Committee shall approve the admission of the applicant to J-TAS Association upon confirmation of the eligibility. In case that there are differences in opinion between the members of the Committee, the admission of the applicant shall be approved with a two-thirds of majority vote in favor

4.4 Certificate of J-TAS membership

The Committee issues a certificate of J-TAS membership to the approved applicant. The certificate is valid for two (2) J-TAS fiscal years when annual membership fee for the second fiscal year is properly paid as stipulated in Clause 6 below.

5. Acceptance notification

The Committee shall inform in writing the applicant of its granted membership of J-TAS member (hereinafter referred to as “the Member”) based on the approval of admission in Clause 4.3. The certificate of J-TAS membership shall be accompanied with this written information to the applicant.

6. Billing of admission and other fees

The Committee shall issue the Member an invoice for fees and deposit listed in Chart 1 below, which will be due in two (2) weeks from an issuing date of the invoice.

Chart 1: List of admission and other fees

Admission fee (Only at admission)	Annual membership fee (yearly)	Security deposit (Only at admission)
JPY 100,000.-	JPY 80,000.-	JPY 80,000.-

All fees are in Japanese Yen terms. Make remittance in Japanese Yen only. Each fee shall be paid by bank transfer. Every commission on money exchange and bank charges on remittance shall be borne by the applicant/the Member. Specify a bank charge classification as “OUR” at the time of remittance.

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The fiscal year of J-TAS Association starts in April and ends in March next year. The annual membership fee for the following fiscal year shall be paid by the end of March of the year. In case that the invoice for the initial annual membership fee is issued after 1st of October of a year, the Member shall be exempt from the annual membership fee for the second J-TAS fiscal year.

7. Voluntary withdrawal

The Committee accepts an withdrawal of the Member in writing and its withdrawal will be effective at the end of the fiscal year. In case of voluntary withdrawal, the security deposit paid at admission will be reimbursed.

8. Exclusion

The Committee is entitled to disaffiliate the Member when it falls under at least one of the following items. The Committee shall inform the said Member in advance and give a chance to defense.

a) The Member who falls behind in payment of the annual membership fee for more than twelve (12) months, or fails to fulfill any of the obligations set forth in Clause 10.1 of JBA Traceability Audit System Practice Regulations (see Attachment 2)
b) The Member who hinders or intends to hinder the activities of J-TAS association
c) The Member who commits an injustice as to the exploitation of the activities of J-TAS association
d) The Member who commits a crime or any other actions that damage the credibility
e) The Member who failed in business
f) The Member who is subject to an order for the commencement of guardianship or the commencement of curatorship
g) The Member who deceased or is subject to an adjudication of disappearance

In case that the Member falls in any of the cases from e) through g), the Committee may exclude the said Member without advance notice.

9. Rights and obligations relating to withdrawal or exclusion

When the Member has lost its eligibility for the Member of J-TAS Association according to Clause 7 or Clause 8 above, the said Member shall be forfeited rights and shall be released from obligations of the Member, except for unfulfilled obligations. The Committee shall not reimburse paid admission fee and annual membership fee(s). No security deposit shall be reimbursed when disaffiliated by exclusion.

10. Enforcement date

This Provisions on Admission is enforced on November 1, 2018.
This Provisions on Admission is revised and enforced on May 10, 2019
This Provisions on Admission is revised and enforced on August 1, 2020.
This Provisions on Admission is revised and enforced on December 5, 2024

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Application form for admission (Form “Provision on admission 01”)

ATTN : Japan Bedding Goods Association / J-TAS Committee

Application for Admission to J-TAS Association

I (we) hereby assent to the mission of J-TAS, and would like to submit this application for admission with a written pledge.

Date (mm/dd/yyyy) :

Address :

Company Name :

Representative Executive:

(print)

(signature)

1. Nature of business (every applicable intended entity of document preparation: see Attachment 1)

☐ Procurement trader of raw materials (Country of Origin)
☐ Down & feather processor (Processing country)
☐ Labeler (Japan)
☐ Production management of down & feathers (Japan)
☐ Production management of down & feather products (Japan)
☐ Importer (Japan)

2. Factory or office of the intended entity of document preparation

A) Name of factory or office:
Address :
Phone :
Nature of business:

B) Name of factory or office:
Address :
Phone :
Nature of business:

C) Name of factory or office:
Address :
Phone :
Nature of business:

3. Company information

(as attached)

4. Contact person

Full name :
Phone :
Fax :
e-mail :

Do not fill in anything in the field with “＊” below.

＊ Receipt date	＊ Receptionist	＊ Receipt number	＊ Remarks

Company Information

Fill-in Date: _____
(MM/DD/YYYY)

Company name	
Head office (address)	
Representative executive	
Phone	
Company webpage URL	
Product lineups	
Main sale destination in Japan	
Date of foundation	
Capital stock	
Annual sales	_____ (Fiscal year) : Actual achievement _____ thousand US dollars
Responsible person for down & feathers	Title Name
Number of employees	Total (Number of part-timers)

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(Attachment 1)

Definition of the intended entity of document preparation
listed in “1.” of the application for admission to J-TAS Association.

J-TAS shall be applied to the following intended entities of document preparation relating to J-TAS .

a) Procurement trader of raw materials (in country of origin) : A procurement trader exports down and feathers to processing country and/or to Japan. A slaughter house, a down and feather collector or processor, or a trade firm are included in this classification. Transference of down and feathers within the EU territory is not regarded as export.

b) Down and feather processor (in processing country) : A down and feather processor means who imports down and feathers from the country of origin and executes refinement processing of the down and feathers in a country other than the country of origin.

c) Importer (in Japan) : An Importer means who imports down and feathers into Japan from the procurement trader and/or the down and feather processor.

d) Production management of down and feathers (in Japan) : A down and feather management means who sources down and feathers from the importer and assumes responsibility for refinement processings. (refinement processings can be outsourced)

e) Production management of down and feather products (in Japan) : A production management of down and feather products means who sources down and feathers from the importer and/or the production management of down and feathers, and assumes responsibility for production of down and feather bedding goods (filling of down and feathers as well as sewing processes can be outsourced).

f) Labeler (in Japan) : A labeler means who exhibits an appellation of origin and others on down and feather bedding goods.

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ATTN : Japan Bedding Goods Association / J-TAS Committee

Letter of Commitment (Pledge)

At the admission to J-TAS Association, I (we) hereby solemnly undertake to agree and observe the followings;

1. to execute obligations of the intended entity of document preparation stipulated in Clause 3 of JBA Traceability Code of Conduct (Attachment 2)and to observe the regulations of J-TAS Label use in Appendix 2 of JBA Traceability System Practice Regulations (Attachment 3).

2. to observe “Act against Unjustifiable Premiums” and “Misleading Representations”, “Act against Unfair Competition”, “Trademark Law”, “Tariff Act”, and “Household Goods Quality Labelling Act” relating to down & feather materials and down & feather bedding goods.

3. to pledge that the pledger has not been punished with that heavier than a fine in breach of laws and regulations in past two years.

4. to pledge that the pledger shall not defame goodwill of J-TAS or commit violative Act against J-TAS Label and Logo mark.

Date (mm/dd/yyyy) : _____

Address : _____

_____

Company Name : _____

Representative Executive:
(print Title & Name) _____

(signature) _____

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Obligations of intended entity of document preparation set forth in Clause 3 of JBA Traceability Code of Conduct 【extract】

3. Obligations of intended entity of document preparation

The intended entity of document preparation shall comply with the following obligations of the intended entity of document preparation for the purpose of proper operation of J-TAS.

a) J-TAS member who intends to exhibit any of a) or b) or c) in Clause 9.2 of JBA Traceability Audit System Practice Regulations, shall attach the J-TAS label on down and feather bedding goods
b) In order to guarantee accuracy of Country of Origin and other informations of down and feathers, a management structure to fulfill the requirements set forth in Clause 11 of JBA Traceability Audit System Practice Regulations should have been formed
c) In order to confirm eligibility for the requirements set forth in Clause 11 of JBA Traceability Audit System Practice Regulations, the traceability audit (including Traceability extraordinary audit) by the audit institution based on JBA Traceability Audit Standard shall be satisfied
d) Descriptions of down and feather material as well as down and feather bedding goods shall abide by requirements for notation set forth in Clauses 11.3 and 11.4 of JBA Traceability Audit System Practice Regulations
e) When using J-TAS labels and/or the Logo mark issued by the Committee, the labels shall be properly managed according to Appendix 2 “Regulation of J-TAS label use” of JBA Traceability Audit System Practice Regulations
f) The intended entity of document preparation shall accept the sampling test on marketed merchandise set forth in Clause 15 of JBA Traceability Audit System Practice Regulations. Also it shall submit documents requested by J-TAS Committee and/or the Audit Institution on the occasion of the sampling test
g) In case of any breach of the obligations which lie with the intended entity of document preparation, it shall accept penalties set forth in Clause 4 herein
h) The intended entity of document preparation shall obtain the latest version of the following J-TAS documents
    1) JBA Traceability Audit System Practice Regulations
    2) JBA Traceability Code of Conduct
    3) JBA Traceability Audit System Standards
i) The intended entity of document preparation shall pay all the fees (admission fee and others) relevant to J-TAS Association and J-TAS Label costs

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j) The intended entity of document preparation shall agree to accept and pledge to comply with all the regulations stipulated in this Code of Conduct by submitting a letter of commitment to the Committee
k) The intended entity of document preparation shall comply with all the requests by J-TAS Committee

4. Penalties

When an intended entity of document preparation breaches any of its obligations set forth in Clause 3 above, J-TAS Committee shall be entitled to impose the following penalties on the intended entity of document preparation, and the said intended entity of document preparation shall comply with the punitive measures imposed without delay. The Tokyo District Court shall have exclusive primary jurisdiction with respect to all disputes arising with J-TAS.

a) Levy of remediation report
b) Halt of shipment of down and feather materials and/or down and feather bedding goods in dispute
c) Halt of supply of J-TAS Labels
d) Return of all J-TAS Labels in hand (those J-TAS Label costs shall not be reimbursed)
e) Restitution of damages on J-TAS Association both in directly and/or indirectly caused by infringement actions or by significant defamation of goodwill of J-TAS
f) Publication of the fact (entity name and cause) of significant defamation of the J-TAS brand or infringements, and report to the regulatory agency
g) When breach is confirmed, execute a callback of products and report to J-TAS Committee the concrete quantity of the products already sold (to retailers) and distribution channels of those products
h) When breach is confirmed, confiscation of the deposit (amount to be confiscated shall be decided on the degree of infringement)
i) Implementation of provisional JAB Traceability Audit
j) Expulsion from the J-TAS Member of J-TAS Association
k) In case that the evaluation result of the Traceability extraordinary audit requested by J-TAS Committee is rated as “Fail”, payment for all the expenses arising from such audit
l) and any other penalties which J-TAS Committee acknowledges as necessary

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Regulations on J-TAS Label use set forth in Appendix 2 of JBA Traceability Audit System Practice Regulations 【extract】

This Appendix is to set a management method relating to Clauses 10.1 e), 11.3 b) and 11.4 c) of this Practice Regulations for the purpose of proper usage of the Label and logo mark by the Authorized Labeling Company.

1. Items to be observed on the use of the Label

The Authorized Labeling Company shall observe the following

a) The Label shall only be applied to down and feather bedding goods that meet the requirements by J-TAS
b) A serial number shall be displayed on the Label
c) The Authorized Labeling Company intending to use the Label shall obtain the Label issued by the J-TAS Label ordering system
d) The Authorized Labeling company shall make payment for the Label to be issued
e) The Authorized Labeling Company shall properly manage the issued Label and shall not sew the Label on any down and feather bedding goods other than those approved by J-TAS. A management system shall be established by the internal standards in order to enable to track and manage in-and-out of the Label, to avoid mis-use of the Label on down and feather bedding goods and others
f) The Label shall not be transferred
g) The Authorized Labeling Company shall bear all the responsibilities of its labeled down and feather bedding goods
h) The Label mush be sewn onto down and feather bedding goods
i) When intending to use the design of the Label other than the use of the Label on the down and feather bedding goods, the Authorized Labeling Company shall obtain an approval in writing from the Committee as to the purpose, place, goods to use and other informations
j) In case that the Authorized Labeling Company falls under one of the following cases, it shall immediately return all the remained Labels in hand to the Committee
    1) when the Authorized Labeling Company has withdrawn from the Member of J-TAS Association or has become no longer the Authorized Labeling Company
    2) when the Authorized Labeling Company has discontinued its business operation
    3) when seriously obstructing the investigation of default
    4) When violating the regulations on J-TAS Label use
    5) when fabricating the Label or using altered label
    6) when the Committee determines a need to do so

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2. Items to be observed on the use of logo mark

The Authorized Labeling Company using a specific logo mark designed for J-TAS (hereinafter referred to as “the Logo mark”) shall observe the following.

a) Down and feather bedding goods to use the Logo mark shall be subject to J-TAS.
b) When using the Logo mark in sales promotional materials, it must be accompanied by the name of the Authorized Labeling Company.
c) When using the Logo mark in sales promotional materials, it shall be used in the manner shown below. In case the Logo mark is to be used in different manners, an approval on those manners from the Authorized Labeling Company or the Committee shall be obtained in advance.

Usage manner example 1

d) The Authorized Labeling Company shall manage the Logo mark properly based on the principle of self-responsibility and shall not use any description which is false or may cause misunderstanding. A management system of the Logo mark as to retention or avoidance of mis-use, etc. shall be established by the internal standards.
e) The Logo mark shall not be transferred.
f) The Authorized Labeling Company who uses the Logo mark shall bear all the responsibilities of its down and feather bedding goods with the Logo mark.
g) In case that the Authorized Labeling Company falls under one of the following cases, it shall immediately cease the use of the Logo mark.
    1) when it has withdrawn from the Member of J-TAS Association or it has become no longer the Authorized Labeling Company
    2) when it discontinued its business operation
    3) when seriously obstructing the investigation of default
    4) when violating the regulations on J-TAS Label use
    5) when fabricating the Logo mark or using altered logo
    6) when the Committee determines a need to do so

3. Measures for infringement

In case that the Authorized Labeling Company infringes any of the Clause in this Appendix 2 relating to the use of the Label and/or the Logo mark, the Committee may impose punitive measures according to JBA Traceability Code of Conduct.

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Definition set forth in Clause 4
of JBA Traceability Audit System Practice Regulations 【extract】

4. Definitions

Terms and definitions used in the Practice Regulations are as follows;

Terms	Definitions	Criteria	Referential Documents and Remarks
Origin of raw material down and feathers			
Country of Origin	Appellation of origin shall be not a name of region but a country name where waterfowls grow or down and feathers are plucked. When the name of farming region is necessary, it shall be accompanied by the country name. * Egg laying or hatching region cannot be a county of origin. * A country of origin shall be one and only one, not be used for mixed down and feather from different origins. * A country of origin shall not be combined with such words like “pure”, “containing”, “using” or “mixed”. (e.g. “Pure France” “Using Poland origin”)	100% of described material	Traceability audit by the documents containing the Country of Origin (when name of farming region is used, the documents containing the name of region should be included) and production records.
Breeding and picking methods			
Mother	Waterfowl farmed for laying eggs	100% of described material	Certificates showing the methods of farming (One or more of the following options: Purchase record from mother farmer, Certificate issued by an official organization, Veterinary certificate, Invoice, Certificate from a seller in the country of origin.) No abbreviation like “MH” is allowed.
Harvest	Plucking method during molting period. (Synonym: Molting harvest, Molt harvesting)	100% of described material	Certificates showing picking method (One or more of the following options: Veterinary certificate, Invoice, Certificate from a seller in the country of origin.)
Machine pick	Plucking method by machine after slaughtered waterfowls, and some cases partially plucked by hand for better quality down. (Synonym: Machine pluck)		

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Hand pick	Plucking method by hand while waterfowls are alive and not during molting period. (Synonym: Hand pluck, Live pluck, TEZUMI)	This method or using this term is strictly forbidden.	This is against animal welfare, and an inappropriate plucking method.

Color of down and feathers			
White	White down or feathers	Less than 1.5% of gray down mixed.	Gray down merger testing method by JDFA. (Less than 3-4 degree in the gray scale for contamination.) (＊JDFA = Japan Down Products Corporative Association)
Pure white	White down or feathers with lesser mixing ratio of colored down or feathers (gray, black point or black spot) . (Synonym: Junpaku)	Less than 0.05% of gray down mixed.	
Gray	With higher mixing ratio of colored down or feathers than “White” above. (Synonym: Silver)	More than 1.5% of gray down mixed.	
Genera of birds			
Goose	Goose, Wild goose Original species are two kinds of Anatidae, Anser albifrons (Greater White-fronted Goose)	With more than 90% of goose.	Description of goose is based on the bird species identification testing method by IDFA.
Duck	Duck, Domestic duck Original species is Anatinae	With more than 90% of duck.	
Others	Eider Somateria, Somateria mollissima (Barnacle leucopsis is not a kind of Eider, thus cannot be described as Eider.)	100% of described species of bird.	Genera or species of birds as written in certificates (One or more of the following options: Veterinary certificate, Invoice, Certificate from a seller in the country of origin).
Down processing methods			
Raw down and feathers	Unwashed down and feathers. (Synonym: Original, Pre-washed down, Pre-washed feathers, Raw down, Raw feathers.)		JIS L 0216 Glossary of terms used in feathers.
Washed down and feathers	Down and feathers after washing process. (Washing process: raw material → dust removal → washing → dehydration → hot-drying/sterilization → cooling → dust removal → (sorting) → storing) (Synonym: Scoured down and feathers, Washed down, Washed feathers)		JIS L 0216 Glossary of terms used in feathers.
Domestic washing	Washing process done in Japan		
Power-up	Process of decompression of previously compressed raw materials to retrieve bulkiness. (Washing effect cannot be gained)		
Manual sorting	to sort washed down and feathers by hands to select high quality down.(High down content, Sticky down, etc.)		
Traceability			
J-TAS	J-TAS stands for JBA Traceability Audit System.		

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J-TAS Association	Operational body of J-TAS.		
J-TAS Committee	Committee that examines result of traceability audit and judges eligibility of intended entity of document preparation.		
J-TAS Member	A member of J-TAS Association		

J-TAS Authorized Labeling Company	Intended entity of document preparation who is a J-TAS member and is approved as eligible to use J-TAS Label and passed traceability audit.	Passed traceability audit and approved as eligible to use label.	Traceability audit and J-TAS Committee
Intended entity of document preparation	J-TAS member who belongs to the supply chain of down and feathers, and who prepares, stores and reports material information correctly.		
J-TAS Label	J-TAS Label is a proof of passing the traceability audit by a third-party audit institution, with which country of origin, breeding and picking method, genera or species of bird are traceable. J-TAS label comes with a serial number. (Attached drawing 1) * For labeling, raw material down and feathers must be from single origin, not mixed with down from multiple origins.	Passed traceability audit and approved as eligible to use the label.	Traceability audit an J-TAS Committee
Certificate of Origin	Documents specifying the country of origin for tariff rate calculations. (Certificate of Origin)		
Invoice	Shipping list and billing invoice (Invoice, Commercial Invoice)		
Packing List	Documents showing item names of cargo, quantity, weight, etc. (P/L: Packing List)		
Veterinary Certificate	Fumigation certificate issued by an exporting country authority (not limited to the country of origin). (V/C: Veterinary Certificate, H/C: Health Certificate)		
Bill of Lading	Letter of transmittal (B/L: Bill of Lading, AWB: Air Way Bill, SWB: Sea Way Bill)		
Refining treatment record	Daily refining treatment report (domestic and overseas)		
Transfer record	Letter of transmittal by transporter (Within EU territory: CMR, Waybill)		
Import declaration	Documents to notice an approval of import issued by the customs.		
Receiving and shipping record	Domestic transportation documents (Letter of transmittal)		
Filling record	Domestic processing documents (daily report)		
TC certificate	Business transaction certificate issued by TC system (Transaction Certificate System) after receiving an approval from IDFL. Business transaction certificate must have the IDFL official seal or an authorized signature on it.		
TC input record	Record with business transaction information being input in TC system and with necessary evidential documents uploaded. No IDFL's approval required.		

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Others			
Down power	A unit of bulkiness of down. (Cubic centimeters of 1 gram of down under stable loading) (cm3/g)	A IDFA Gold label complies with quality labeling standards.	JIS L 1903 testing methods of feathers
Fill power	A unit of bulkiness of down. (Cubic inches of 30 grams of down under stable loading) (in3/30g) (Notes: Unit was changed from cubic ounce (in3/oz) to inches (in3/30g) in 2013.		IDFB testing method Part 10-B
Down comforter	Down content of comforter is more than 50% inclusive.		JBA comforter quality indication regulations
Feather comforter	Down content of comforter is less than 50%.		JBA comforter quality indication regulations

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(Reference 2)

Transitional measure stipulated in Clause 17 of JBA Traceability Audit System Practice Regulations
【Extract】

(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.
   d) When down and feathers are refined and processed in more than one country, the weight of the down and feathers to be exported to the next country may result in an increase in the weight from the time of importation.In this case, the intended entity of document preparation shall keep a record issued by a third party (e.g., TC certificates for down and feathers shipped after re-measurement) that can confirm the legitimate origin of the down and feathers to be exported.

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.

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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 Origiin	**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)**
Confir-mation Docu-ments	**(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) Process-ing 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 mush 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.

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(Reference 3)

Transitional measure stipulated in Clause 17 of JBA Traceability Audit System Practice Regulations
【Supplement】

(Traceability on the inventory down and feathers purchased in the past)

Overseas procurement trader of raw materials or down & feather processor is not entitled to supply its down & feather materials as J-TAS authorized unless it owns a title of the J-TAS Authorized Labeling Company as of this moment. For this, the down & feather bedding goods using those down and feather materials which were in a purchase agreement after December 1st, 2018 cannot bear J-TAS Label. To cope with this issue raised by Japanese corporations dealing in down & feather bedding goods, J-TAS Committee has decided to provide an exception to those down & feather materials in a purchase agreement after December 1st, 2018.

This Supplement is to stipulate a way of handing the down & feather materials in a purchase agreement after December 1st, 2018. This Supplement expires when overseas procurement trader of raw materials or down & feather processor becomes a J-TAS Authorized Labeling Company and ready to supply sufficient amount of down & feather materials in conformance to J-TAS. Those down & feather materials being in a purchase agreement during the validity of this supplement will be treated under this Supplement.

1. It is allowed for the down & feather materials which comply with either requirement below to prolong the period written in 1.a) of Transitional measure stipulated in Clause 17 of JBA Traceability Audit System Practice Regulations (Extract) by changing it from “to the enforcement date of JBA Traceability Audit System Practice Regulations” to “to the expiration date of this Supplement”.

   a) Down & feather materials supplied by overseas procurement trader of raw materials or down & feather processor who indicates its willingness to join in J-TAS Association.
   b) Down & feather materials supplied by overseas procurement trader of raw materials or down & feather processor who is a J-TAS Member.

【Reference】

Transitional measure stipulated in Clause 17 of JBA Traceability Audit System Practice Regulations (Extract)

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.

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