

# **JBA Traceability Audit System Practice Regulations**

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

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## JBA Traceability Audit System Practice Regulations

### 1. Introduction

In recent years, buying behavior of consumers in EU nations has been changing and more and more people are looking for ethically produced quality down and feather products. To meet this trend, a system that guarantees traceability of materials used for down and feather-filled products from the source of the materials has been established. There is a compelling need also in Japan for traceability documents and confirmation documents of contents description, which support accuracy of the contents of down and feather products.

In view of the fact that majority of the companies in Japan exhibit the country of origin of down and feathers relating to their bedding goods, Japan Bedding Goods Association (JBA) has set up JBA Traceability Audit System (J-TAS) as a measure to guarantee the origin of down and feathers.

Advantages of joining in J-TAS are many: for instance, it enhances the credibility with purchasers of products sold by a member of J-TAS by eliminating consumer's false recognition of the origin of the down and feathers filled in the products, and makes it easy for consumers to recognize reliability of the products by the J-TAS label on those. It makes easy for consumers to select products by quality, and therefore bedding goods companies are encouraged to develop better quality products.

J-TAS is a system to guarantee security for consumers and to vitalize the industry. J-TAS is applied to bedding goods filled with down and feathers (recycled down and feathers excluded) in Japan. JBA Traceability Audit System Practice Regulations (hereinafter referred to as "the Practice Regulations") observes Act against Unjustifiable Premiums and Misleading Representations, Act against Unfair Competition, Trademark Law, Tariff Act, and Household Goods Quality Labelling Act.

### 2. Objective

J-TAS has following three objectives;

- a) to be a traceability audit system that enables to trace from down and feather bedding goods to sourcing origin of the down and feathers.
- b) to be a traceability audit system that promises reliability and easiness to a consumer when purchasing down and feather bedding goods.
- c) to be a traceability audit system that contributes to members of JBA as well as related organizations and to vitalization of the industry.

### 3. Quoted regulations

The following regulations are hereby partially incorporated by reference in the Practice Regulations. The latest version of each regulation shall apply.

JIS L 0216 Glossary of terms used in feathers

JIS L 1903 Testing methods for feathers

Japan Down Products Corporative Association label usage regulations

Comforter (quilts) quality indication regulations by JBA

IDFB Testing Regulations

### 4. Definitions

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

Terms	Definitions	Criteria	Referential Documents and Remarks
<b>Origin of raw material down and feathers</b>			
Country of Origin	<p>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.</p> <ul style="list-style-type: none"> <li>* Egg laying or hatching region cannot be a county of origin.</li> <li>* A country of origin shall be one and only one, not be used for mixed down and feather from different origins.</li> <li>* A country of origin shall not be combined with such words like “pure”, “containing”, “using” or “mixed”. (e.g. “Pure France” “Using Poland origin”)</li> </ul>	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.
<b>Breeding and picking methods</b>			
Mother	Waterfowl farmed for laying eggs	100% of described material	<p>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.)</p> <p>No abbreviation like “MH” is allowed.</p>
Harvest	<p>Plucking method during molting period.</p> <p>(Synonym: Molting harvest, Molt harvesting)</p>	100% of described material	<p>Certificates showing picking method (One or more of the following options: Veterinary certificate, Invoice, Certificate from a seller in the country of origin)</p>

Machine pick	Plucking method by machine after slaughtered waterfowls, and some cases partially plucked by hand for better quality down. (Synonym: Machine pluck)		
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.	

#### Genre 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.	Genre or species of birds as written in certificates (One or more of the following options: Veterinary certificate, Invoice, Certificate from the 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.		
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, genre 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	Records with business transaction information being input in TC system and with necessary evidential documents uploaded. No IDFL's approval required.		
Others			
Down power	A unit of bulkiness of down. (Cubic centimeters of 1 gram of down under stable loading) (cm <sup>3</sup> /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) (in <sup>3</sup> /30g) (Notes: Unit was changed from cubic ounce (in <sup>3</sup> /oz) to inches (in <sup>3</sup> /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

## 5. Documents on J-TAS.

### 5.1 Document architecture

J-TAS consists of the following documents (hereinafter called "J-TAS Documents").

- a) JBA Traceability Audit System Practice Regulations
- b) JBA Traceability Code of Conduct
- c) JBA Traceability Audit Standards
- d) JBA Provisions on Admission
- e) other documents required by J-TAS Committee

### 5.2 Enactment and revision of the Documents

J-TAS Committee manages the following actions relating J-TAS Documents.

- a) Planning, deliberation, enactment and revision of J-TAS documents
- b) Allot J-TAS member and/or a designated third-party audit institution (hereinafter called "the Audit Institution") an opportunity to submit its opinion prior to revision, if necessary.
- c) In case old version of J-TAS documents need to be kept for archival purpose, those shall be clearly marked as "Reserved Old Version" to avoid misuse.

### 5.3 Disclosure of the Documents

J-TAS Committee discloses J-TAS Documents to J-TAS Member. When any of J-TAS Documents is revised, J-TAS Committee informs, without delay, J-TAS Member and the Audit Institution to enable them to assess the latest version of the documents.

## 6. Structure of J-TAS Association

The structure of J-TAS Association is as described below. (refer to Attached drawing 2)

- a) J-TAS Committee (hereinafter called “the Committee”)
- b) J-TAS Secretariat (hereinafter called “the Secretariat”)
- c) J-TAS Member (hereinafter called “the Member”)
- d) J-TAS Authorized company for J-TAS Label (hereinafter called “the Authorized Labeling Company”)

### 6.1 The Committee

The role of the Committee is as described below.

- a) Enactment and revision of J-TAS Documents
- b) Qualification examination to enroll in J-TAS Association
- c) Designation of a audit institution
- d) Adequacy assessment of traceability audit
- e) Approval of a company to bear J-TAS Label (hereinafter called “the Label”)
- f) Management of the Label and J-TAS logo mark based on Appendix 1.”Management of J-TAS label”
- g) Sampling text on marketed down and feather bedding goods bearing a country of origin on the Label and the like
- h) Deliberation of other necessary matters

### 6.2 The Secretariat

The Secretariat assumes clerical tasks relating to the management of J-TAS under the Committee.

### 6.3 The Member

The Member is an intended entity of document preparation and possesses the following rights;

- a) to obtain information relating to J-TAS (J-TAS Documents and revised information of those)
- b) to express opinions on J-TAS at the Committee
- c) to be an Authorized Labeling Company upon passing adequacy assessment of traceability audit

### 6.4 The Authorized Labeling Company

The Authorized Labeling Company possesses the following rights;

- a) to attach labels issued by the Committee onto down and feather bedding goods
- b) to post J-TAS logo mark (hereinafter called “the Logo”) and/or a swing tag to PR materials, e.g. leaflets
- c) to write out the country of origin, breeding and picking method, genre and species of birds in the descriptions of down and feather bedding goods or of raw material down and feathers

## 7. Admission procedure

### 7.1 Application for admission

Member of JBA, Japan Down Products Corporative Association, Japan Futon Manufactures Association, domestic and overseas corporations who wish to enroll in J-TAS Association shall submit an application form for admission to J-TAS Association and go through due formalities. An international global firm that operates across multiple countries shall not be treated as a single entity, but shall apply for J-TAS membership in each country.

### 7.2 Qualification examination

Member of JBA, Japan Down Products Corporative Association, Japan Futon Manufactures Association, domestic and overseas corporations who submitted the application form for admission will be eligible to be a member of J-TAS Association when it satisfies required qualifications set by the Committee.

### 7.3 Fees

The Member shall pay the admission fee to J-TAS Association, the annual membership fee and the deposit.

### 7.4 Voluntary withdrawal from membership

With an advance notice to the Committee, the Member is allowed to withdraw from J-TAS Association at the end of fiscal year. The notice shall be done in writing at least 90 days before the end of fiscal year. The security deposit paid at the admission shall be reimbursed.

### 7.5 Expulsion

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
- 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 under any of the items from e) through g), the Committee may exclude the said Member without an advance notice.

### 7.6 Notification

The Member shall report to the Committee within seven (7) days from the occurrence of one of the following events.

- a) Change in name, trade name (in case the Member is a legal entity, a business name and its representative name) or place of business
- b) Recess or abolish the business activities in part or in whole
- c) Addition to or deletion from the covered entities by J-TAS stipulated Clause 9.1 below

## 8. Authorized Company for J-TAS Label

### 8.1 Approval of company

The Member shall undergo the initial traceability audit according to JBA Traceability Audit Standards provided separately. When audit result satisfies required qualifications set by the Committee, the Member is designated as the Authorized Labeling Company.

### 8.2 Maintenance of approval

The Authorized Labeling Company shall observe all the obligations set forth in Clause 10.1 and undergo the traceability surveillance audit (including the traceability extraordinary audit) according to JBA Traceability Audit Standards to acquire judgement as qualified by the Committee for continuation of the approval.

### 8.3 Revocation of approval

The Committee is entitled to cancel the approval of the Authorized Labeling Company when it falls under one of the following;

- a) the Authorized Labeling Company who withdrew from J-TAS association
- b) the Authorized Labeling Company who fails to carry out the obligations set forth in Clause 10.1
- c) the Authorized Labeling Company who obtained the approval of the Authorized Labeling Company by unfair manner
- d) the Authorized Labeling Company who commits any act that jeopardizes the credibility of J-TAS

## 9. Scope of application of J-TAS

### 9.1 Covered entities by J-TAS

J-TAS shall be applied to the following intended entities of document preparation relating to J-TAS (refer to Attached drawing 4).

- 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.

## 9.2 Down and feathers as object of J-TAS

J-TAS shall be applied to down and feathers (excluding used or recycled down and feathers, as well as down and feathers without a 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 (excluding those imported down/feather filled bedding goods which produced overseas). In addition, J-TAS may also be applied to down and feathers with the following b) information

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

## 10. Obligations of and penalties for intended entity of document preparation

### 10.1 Obligations of intended entity of document preparation

The intended entity of document preparation shall comply with the following.

- a) The Member who intends to exhibit any of a) or b) or c) in Clause 9.2 above, shall attach the Label on down and feather bedding goods.
- b) In order to guarantee accuracy of the country of origin and other informations of down and feathers, a management structure to fulfill the requirements set forth in Clause 11 should have been formed.
- c) In order to confirm eligibility for the requirements set forth in Clause 11, the traceability audit (including the traceability extraordinary audit) by the Audit Institution based on JBA Traceability Audit Standards shall be satisfied.
- d) Descriptions of down and feather material as well as down and feather bedding goods shall abide by requirements for the descriptions set forth in Clauses 11.3 and 11.4.
- e) When using the Label and/or the Logo mark issued by the Committee, those shall be properly managed according to Appendix 2 "Regulation of J-TAS Label use".
- f) An intended entity of document preparation shall accept the sampling test on marketed merchandise set forth in Clause 15. Also it shall submit documents requested by the 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 10.2.
- 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
  - 4) JBA Provisions on Admission
- i) The intended entity of document preparation shall pay all the fees (admission fee and others) relevant to J-TAS Association and the Label costs
- j) The intended entity of document preparation shall agree to accept and pledge to comply with all the regulations stipulated in JBA Traceability 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 the Committee

## 10.2 Penalties

When the intended entity of document preparation breaches its obligations, it shall be subject to measures according to JBA Traceability Code of Conduct.

## 11. Requirements for the intended entity of document preparation

Requirements set forth in Clause 11.1 through 11.4 are applied to each intended entity of document preparation as set in Chart 1. The intended entity of document preparation shall accept auditing of traceability by the Audit Institution in order to confirm compliance with the requirements.

Chart 1 : Requirements for 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)	•	•		•

### 11.1 Pledge

The intended entity of document preparation shall execute the latest version of the letter of commitment with its signature and seal in order to take a pledge of its understanding and acceptance of the contents of JBA Traceability Code of Conduct. The intended entity of document preparation herewith affirms commitment to responsible actions in relation to the Label, appellation of origin et alia.

### 11.2 Traceability

#### 11.2.1 Records regarding items exhibited on down and feather bedding goods

Items exhibited on down and feather bedding goods shall be guaranteed by records listed in Chart 2.

Chart 2 : 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, Certificate of a seller in the country of origin)
	c) Genre or species of bird Goose	* Record of bird species identification testing method by IDFA
	Others (e.g. Eiderdown)	* Certificate showing genre or species 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.		

#### 11.2.2 Composition of traceability

Required items by traceability are following a) through f), and those shall be defined as the internal standards of the intended entity of document preparation to perform assignment properly. The parties concerned shall be kept informed of the latest version of the said internal standards at all times.

a) The intended entity of document preparation of each phase from a raw material trader at the origin country to a labeler of down and feather bedding goods shall properly hold the following transfer records, import / export records and production records in order to structure traceability on the records set forth in Clause 11.2.1.

- 1) Certificate of Origin      Overseas document
- 2) Invoice                      Overseas document with description of J-TAS (Commercial Invoice)
- 3) Packing List                Overseas document (P/L)
- 4) Veterinary Certificate    Overseas document (V/C, H/C : Health Certificate)

- 5) Bill of Lading Overseas document (B/L, AWB : Air Way Bill, SWB: Sea Way Bill)
- 6) Refining Treatment Record  
Daily refining treatment reports (domestic and overseas)
- 7) Transfer record Overseas transport record (Letter of transmittal, CMR, Waybill in EU)
- 8) Import Declaration Documents to notice an approval of import issued by the customs
- 9) Receiving and shipping record  
Domestic transportation document with description of J-TAS  
(Letter of transmittal)
- 10) Filling record Domestic processing document (daily report)
- 11) TC certificate Business transaction certificate issued by TC system after receiving an approval from IDFL (the certificate must have the IDFL official seal or an authorized signature on it)
- 12) TC input record Records with business transaction information being input in TC system and with necessary evidential documents uploaded.  
No IDFL's approval required.

- b) Regarding managing weight of down and feathers, each intended entity of document preparation shall supervise weight of down and feathers from receiving to shipping in order to compass loss and/or immixture of down and feathers. (Non J-TAS down and feathers included)
- c) Regarding stock of down and feather materials as well as down and feather bedding goods, each intended entity of document preparation shall compass and manage stock status of those
- d) When selecting suppliers, each intended entity of document preparation shall choose among suppliers with the Authorized Labeling Company status.
- e) Regarding the storage of records, each intended entity of document preparation shall establish a management method of the records relevant to required items in Clauses 11.2.1 and 11.2.2 a). A retention period of documents stipulated in Clauses 11.2.1 and 11.2.2 a) shall be ten (10) years from the effective date of each document.
- f) The management method of the records shall be established to enable proper utilization of the internal standards.

### 11.3 Material description

Required matters concerning the description of down and feather materials are as a) and b) below. The intended entity of document preparation shall fulfill the required matters based on the pledge in Clause 11.1 above.

- a) The description of information on down and feather materials shall satisfy the following items.
  - 1) Material information shall bear a description of down ratio and the appellation of origin (Country of Origin). The appellation of origin (Country of origin) can be abbreviated.
  - 2) Material information is shown on leaflets and/or swing tags.
  - 3) Description of down and feathers after the final treatment (ready to be filled into down and feather bedding goods) follows Chart 3 below (including the description in sales promotional materials). The description of down and feathers can be abbreviated.

Chart 3 : Description of goose and duck based on mixing ratio

Description of goose and duck	Goose ratio (%)	Duck ratio (%)
Goose (G)	90 ≤ goose ≤ 100	0 ≤ duck ≤ 10
Duck (D)	0 ≤ goose ≤ 10	90 ≤ duck ≤ 100

Those down and feather materials with goose ratio of more than 10% but less than 90%, duck ratio of more than 10% but less than 90% are excluded from J-TAS, due to inability to describe as “down” or “feathers”.

- 4) When describing appellation of origin, breeding and picking method, genre or species of birds in material information, those must be accompanied by documents of proof (e.g. TC certificate) of each item and confirmation of informations.
- b) It shall be made clear by the Logo mark, etc. on each bale that the down and feathers contained are met J-TAS.
- c) The Logo mark shall be properly managed according to Appendix 2 “Regulations on J-TAS Label use”.

#### 11.4 Product description

Required matters concerning the description of down and feather bedding goods are from a) to c) below. The intended entity of document preparation shall fulfill the required matters based on the pledge in Clause 11.1 above.

- a) The description of information on down and feather materials shall satisfy the following items.
  - 1) material information must be clearly distinguished from a description of mixing ratio (down % / feather %) of “Quality indication” stipulated by the Law.
  - 2) the material information must be displayed separately from the “Quality indication” or written on leaflets and/or swing tags.
  - 3) description of down and feathers is as set in Chart 3 above (including the description in advertisements).
  - 4) when describing appellation of origin, breeding and picking method, genre or species of birds in material informations, it must be accompanied by documents of proof (e.g. TC certificate) of each item and confirmation of informations.
  - 5) items described in the material information (Country of Origin, name of species, down or feathers) shall be written in the following order and with the term.

Order :            appellation of origin (country / region) + species (picking method / color / species of birds) + (insert space or “ · ”) + mixing ratio

- Example :
- 1) France White Duck down down 90% / feather 10%
  - 2) France White Duck down 90% / feather 10%
  - 3) Poland Mazury White Goose down · down 90% / feather 10%

- 6) the description must be properly done by observing Household Goods Quality Labelling Act, Act against Unjustifiable Premiums and Misleading Representations, Trademark Law, and other relevant laws and regulations.
- b) It shall 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) The Label must be firmly affixed on to down and feather bedding goods at easily noticeable place to users (consumers) and not covered by sewing joints. The labels shall be properly managed according to Appendix 2 "Regulation of J-TAS Label use"

## 12. ApPOINT of auditing organization

By keeping an independent neutral stance, the Committee shall appoint an auditing organization with qualifications of ISO/IEC17065 or equivalent regulations.

## 13. Traceability audit

The Audit Institution conducts a traceability audit (on-site, remote or other measures) on intended entity of document preparation to confirm compliance with the requirements set in Clause 11, according to JBA Traceability Audit Standards.

## 14. Approval for labeling and announcement of authorized company

The Committee deliberates on results of a traceability audit by the Audit Institution based on JBA Traceability Audit Standards. Upon acceptance decision after deliberation, the Committee authorizes a license to the intended entity of document preparation to be an authorized company of J-TAS Label, and issues a certificate of J-TAS Authorized Labeling Company with the items below. The Committee shall announce officially the information of the Authorized Labeling Company on the website of JBA.

- a) Information on the Applicant (Company name and address, Certificate number, entity category)
- b) Notice of approval as a J-TAS Authorized Labeling Company
- c) Validity of the Certificate of J-TAS Authorized Labeling Company (initial validity term expires at the end of the J-TAS fiscal year and it can be extended for one (1) J-TAS year successively thereafter)
- d) Special note, etc.

## 15. Sampling test on marketed merchandise

The Committee conducts sampling test according to Appendix 3 "Implementation of sampling test" on labeled and non-labeled generic merchandises for sale, in order to assess degree of compliance with the requirements set forth in Clause 11.

16. Enforcement date

This Practice Regulations is enforced on December 1, 2018.

This Practice Regulations is revised and enforced on August 1, 2020

This Practice Regulations is revised and enforced on December 5, 2024.

17. Transitional measure

A transitional measure for those down and feathers in inventory which are obtained by purchase agreement before the initial enforcement date of this Practice Regulations in 2018 will be specified separately.

## Appendix 1: Management of J-TAS Label

This Appendix is to set a method of management relating to Clause 6.1 f) of this Practice Regulations for the purpose of proper management of the Label by the Committee.

### 1. Method of the Label issuing and the serial number management

- a) The Committee shall issue the Label based on J-TAS Label ordering system
- b) To prevent excessive issuing of the J-TAS Label, the Committee shall request an importer or an owner of the inventory down and feathers as described in transitional measure stipulated in Clause 17 to fill in the following items in the J-TAS Label ordering system.
  - 1) Authorization number of TC Certificate (XXXXXX/YY-ZZZZZZ)
  - 2) For the owner of the inventory down and feathers as described in transitional measure stipulated in Clause 17 without the TC Certification, a dummy number according to the following method; same two digits (11) + company number (1234) + last two digits of the year (20) + six digits original number (123456). Company number shall be a unique number relating only to TC System.
- c) The Committee shall request the Authorized J-TAS Labeling Company asking for the label to be issued to fill in required items in the J-TAS Label ordering system. Also the Committee shall manage records of the issued Labels and the name of the Authorized labeling company by the J-TAS Label ordering system.

### 2. Administrator of the J-TAS Label ordering system

The Committee shall appoint an administrator of the J-TAS Label ordering system.

### 3. Assignment method of serial numbers of the Label

In order to easily trace the down and feather raw material information by the Label attached to down and feather bedding goods, a serial number is assigned to the Label. The serial number consists of Country of origin, country code based on ISO 3166-1 alpha-2, and two-alphabet and numerals.

**【example】** Country code (ISO 3166-1 alpha-2)

Country of origin	Country code	Country of origin	Country code	Country of origin	Country code
Poland	PL	Hungry	HU	France	FR

**【example】** serial number (Country code + two alphabets + eight digits)

An example of down and feather bedding goods using Polish down and feathers is;

PLAB12345678

Abbreviation of genre of birds, color of down and feathers may be added to the serial number.

<b>Abbreviation</b>	<b>Description</b>
WD	White duck
WG	White goose
GD	Gray duck
GG	Gray goose
ED	Eider duck
OT	Others

## Appendix 2: Regulations on J-TAS Label use

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 must 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

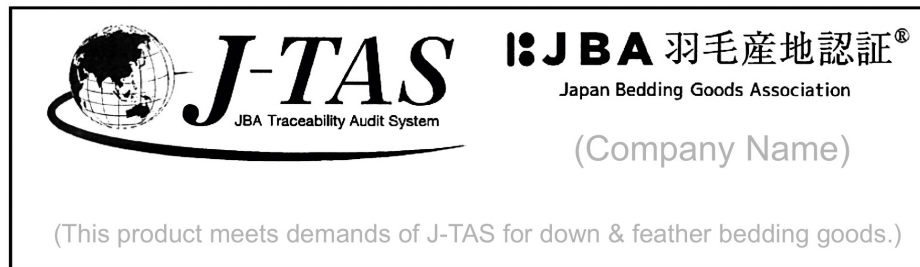
### 2. Items to be observed on the use of logo mark

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 and its license number.
- 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.

### Appendix 3: Implementation of sampling test

This Appendix is to set a method of sampling test stipulated in Clause 15 of this Practice Regulations to guarantee reliability by proper description of the contents of down and feather bedding goods showing the Country of Origin in the Label and/or by other means. The down and feather bedding goods purchased for the purpose of sampling test shall hereinafter be referred to as “the Testing Sample”.

#### 1. Sampling method

- a) The Testing Sample may be purchased as needed
- b) Buying timing, item, buying manner of the Testing Sample shall be based on the sample purchase method set by the Committee
- c) In principle, the Testing Sample is chosen from down and feather bedding goods showing the Country of Origin on the Label or by other means.

#### 2. Verification of the Testing Sample

- a) Verification institution : commission to an auditing organization
- b) Verification items : requirements stipulated in Clause 11
- c) Verification method : the following verifications shall be conducted on the Testing Sample
  - 1) An Audit Institution shall request the intended entity of document preparation of the Testing Sample to submit necessary documents and records, and shall confirm (in writing) whether it meets the requirements by Clauses 11.1 and 11.2
  - 2) An Audit Institution shall confirm whether the Testing Sample meets the requirements by Clause 11.4 as to the items regarding the product description
- d) Judgement criteria : level of fulfillment of the requirements in b) above

#### 3. Measures taken on verification result

In case sampling test reveals the Testing Sample does not meet the judgement criteria set in 2.d) above, the Committee shall be entitled to impose the penalty measures on the intended entity of document preparation of the Testing Sample according to JBA Traceability Code of Conduct.

Appendix 4: information described in TC certificate

This Appendix establishes guidelines for information to be described in TC certificates regarding product and its transportation information, in order to ensure the appropriateness of the contents of the description and to guarantee reliability.

The product and its transportation information shall be described according to the Chart 4 below.

Chart 4 : Information described in TC certificate (product and its transportation information)

Items	Descriptions	Imperative	Conditional imperative *	Optional **	Remarks
Product name and Composition	Country name	✓			
	Region name		✓		
	Breeding method		✓		Mother
	Picking method		✓		Harvest
	Color		✓		White, etc.
	Genre of birds	✓			Goose, Duck
	Species of birds		✓		Eider, etc.
	Down ratio			✓	
	Feather ratio			✓	
Weight	Gross weight	✓			
	Net weight	✓			
	Certified weight	✓			
Transport information	Transport document number	✓			
	Transport document issue date	✓			
Billing information	Invoice number	✓			
	Invoice issue date	✓			
Country of origin	Country name	✓			
Remarks	Lot/batch number			✓	
	Region name		✓		
	Breeding method		✓		Mother
	Picking method		✓		Harvest
	Genre of birds			✓	Goose, duck
	Species of birds		✓		Eider, etc.

\* "Conditional imperative" means required items under the condition of certain descriptions for down materials to be referred to.

\*\* "Optional" means items subject to the applicant's instructions.

Attached drawing 1: J-TAS label

1. Sewn-on Label :



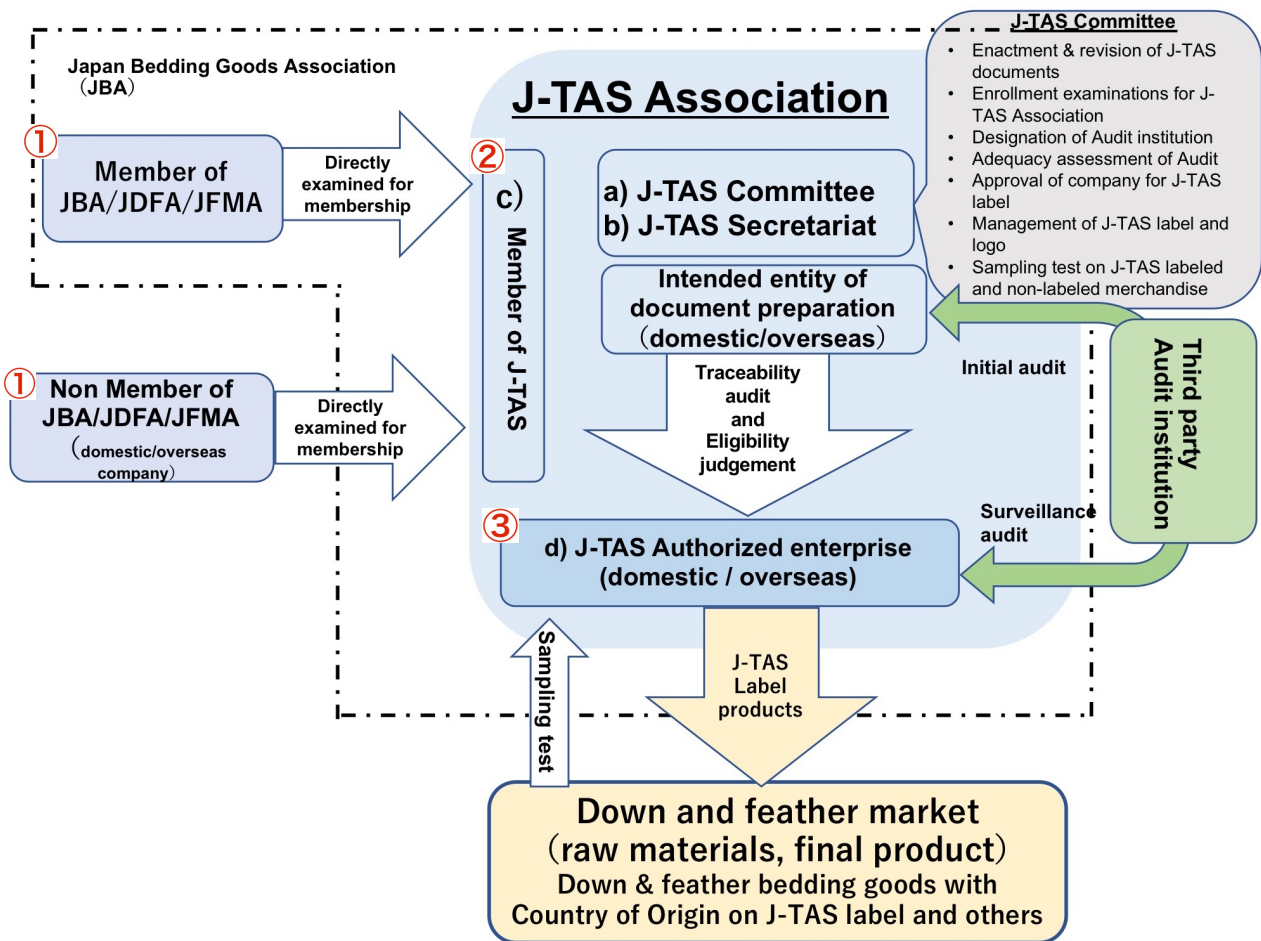
2. Descriptive text :

This product is filled with reliable down and feathers, whose traceability of origin has been confirmed by the J-TAS Committee operated under Japan Bedding Goods Association, based on an audit by an external professional auditing organization.

3. Descriptive text on a former sewn-on label

J-TAS label is a proof that this product uses reliable down and feathers audited by the auditing organization designated by Japan Bedding Goods Association (JBA) and certified by J-TAS Committee under JBA.

Attached drawing 2: Structure of J-TAS





Attached drawing 4 : Intended entity of document preparation and documents for J-TAS

Documents	(C), Japan							
	(A) Country of Origin	(B) Processing country	Importer	Production management of down & feathers	Down & feather processor	Production management or down & feather products	Down & feather filling	Labeler
a. Export documents	Trader of raw materials	Down & feather Processor						
	Certificate of Origin	Certificate of Origin from (A)	Certificate of Origin from (A)					
	Invoice	Invoice from (A)	Not required when imported through (B) Invoice from (A)					
	P/L Packing List	Packing List from (A)	Packing List from (A)					
	V/C: Veterinary Certificate H/C: Health Certificate	Veterinary Certificate from (A)	Veterinary Certificate from (A)					
	B/L: Bill of Lading	Bill of Lading from (A)	Bill of Lading from (A)					
	Buying-in documents from mother goose and duck farmers (when applicable)							
		Invoice of (B)	When imported through (B), Invoice from (B)					
		Packing List of (B)	When imported through (B), Packing List from (B)					
		Bill of Lading of (B)	When imported through (B), Bill of Lading from (B)					
b. Import documents		Import Declaration (A)→(B)	Import Declaration (A)→(C) Not required when imported through (B)					
			When imported through (B), Imported Declaration (B)→(C)					
c. Transfer Records (Documents for incoming and outgoing deliveries)	When there's transfer (Transfer Record)							
			Shipping materials	Receiving materials				
			Shipping raw materials, receiving refined down & feathers	Shipping raw materials, receiving refined down & feathers	Washing process			
			Shipping refined down & feathers	Shipping refined down & feathers		Receiving of processed down & feathers		
						Shipping refined down & feathers, Receiving products	Filling	
						Shipping products		Quality indication
d. Production Records	When refined at Country of Origin, Processing Records per lot							
		Processing Records per lot		Processing Records per lot				
							Filling records of down & feathers	
								Shipping Record of down & feather products
e. Transaction information (TC)	TC Certificate	Transaction Certificate from (A)	Transaction Certificate from (A) Not required when imported through (B)	Transaction Certificate from (A) Not required when bought via (B)	Transaction Certificate from (A) Not required when bought via (B)	Transaction Certificate from (A) Not required when bought via (B)	Transaction Certificate from (A) Not required when bought via (B)	Transaction Certificate from (A) Not required when bought via (B)
		Transaction Certificate of (B)	When imported through (B), Transaction Certificate from (B)	When went through (B), Transaction Certificate from (B)	When went through (B), Transaction Certificate from (B)	When went through (B), Transaction Certificate from (B)	When went through (B), Transaction Certificate from (B)	When went through (B), Transaction Certificate from (B)
e. Transaction information (TC input records)	Documents and Records above as well as Pledge	Documents and Records above as well as Pledge	TC input records (when applicable)	TC input records (when applicable)	Documents and Records above as well as Pledge	Documents and Records above as well as Pledge	Documents and Records above as well as Pledge	Documents and Records above as well as Pledge
	Documents and Records above as well as Pledge	Documents and Records above as well as Pledge	Documents and Records above as well as Pledge	Documents and Records above as well as Pledge	Documents and Records above as well as Pledge	Documents and Records above as well as Pledge	Documents and Records above as well as Pledge	Documents and Records above as well as Pledge

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