



**Asia-Pacific
Economic Cooperation**

2011/MAG/WKSP2/007

Self-Certification System in Japan

Submitted by: Japan



**Self-Certification Pathfinder Phase 2:
Capacity Building Workshop 3
Bandar Seri Begawan, Brunei Darussalam
4–5 April 2011**

Self Certification System in Japan

For dissemination at the APEC Workshop on Self-Certification in
Brunei Darussalam

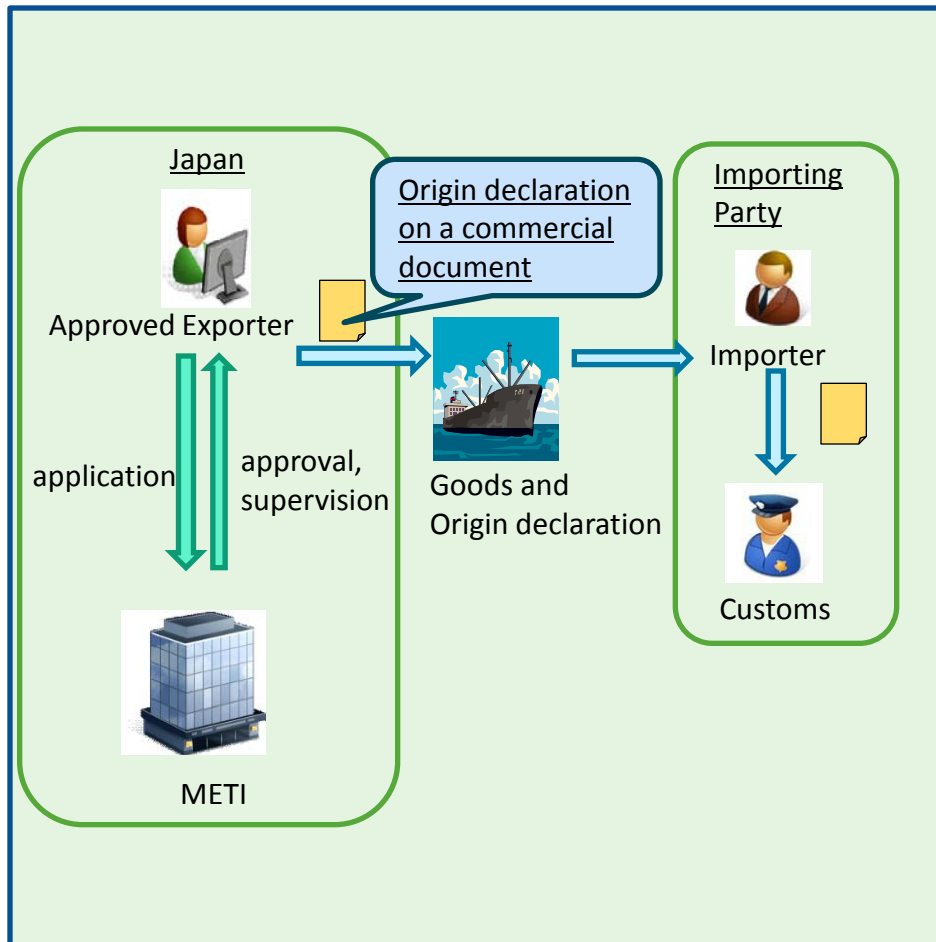
Origin Certification Policy Office
Ministry of Economy, Trade and Industry
Japan

Japan has introduced the self-certification system since September 2009.

The self-certification ...

- is available for exporters with government approval;
- is available for exportation for Switzerland so far; and
- will be available for those for Peru and Mexico soon.

System Overview



- ✓ Exporters apply for the status of “approved exporter” to the Ministry of Economy, Trade and Industry (METI).
- ✓ METI confers the status (with approval number) when the application meets the criteria.
- ✓ “Approved exporter” can make out origin declaration on a commercial document. (e.g.: invoice, packing list)
- ✓ METI can issue corrective order, conduct inspection, and revoke the approval in certain cases.

Advantages of the system

Under the self-certification system, exporters can enjoy;

- shorter lead time than obtaining COs from the issuing body;
- less paperwork (application) than obtaining COs;
- no issuing fee.

Origin declarations by “approved exporters” retain high level of confidence because of examination and approval of such exporters by the government.

Major Challenges

Introducing Self-Certification system raises two major challenges:

1. Setting approval criteria which is...
 - workable (to approve only eligible exporters)
 - clear and simple (to make the approval process foreseeable)

2. Improve compliance levels of...
 - approved exporters (to keep them rule-abiding)
 - other exporters (to encourage them to make application for approved exporters)

Challenge #1: Setting Approval Criteria

Exporters with “sufficient knowledge and competence to conduct operations of producing an origin declaration properly and reliably” can be approved.

To approve them, exporters should demonstrate followings to METI:

- Exporter obtains preferential COs regularly;
- Certification personnel (with certain experiences) is assigned;
- Senior officials responsible for compliance is assigned;
- Exporter maintains appropriate certification procedure; and
- Exporter maintains close contact with METI/producer(if any).

Challenge#2: Improving Compliance levels

1. Introduce Obligations for Approved Exporters

In addition to preservation of documents proving originating status...

Recordkeeping of own declarations

e.g. date of issuance, HS code/name/volume of goods, invoice number, name and address of importer

Notification of noncompliance, major changes to METI

e.g. lack of originating status, major errors in origin declarations, change of company name/address or goods to be exported

Renewal of approval (every 3 years)

- Penalty, sanction (revocation of approval) applied against violations.
- METI can order exporters to report/make correction, or conduct inspection.

Challenge#2: Improving Compliance levels (cont'd)

2. Issuing Guidelines for In-house Examination

- Guidelines show examples of CTC/VA examination worksheet and necessary support documents, basic concept and important points of ROO.
- Several kind of guidelines are released (general, textile, chemical products) under close cooperation with related industries.

Examples of worksheet for CTC/VA examination

【対象産品】生産国：日本、製造場所：●●工場、仕向地：タイ
 【適用した原産地規則】関税番号変更基準：CTH（4桁変更）

作成日：〇年〇月〇日

産品		部材			
HSコード	産品名	HSコード	部品名	単価	原産情報等
		3917.29	プラスチック		
		3923.50	プロ		
		3926.90	Drive		
		4016.93	ワッ		
		5901.90	板物		
		7318.14	Recepta		
		7318.15	Tapping screw		
		7318.16	Nut		
		7318.21	Glass fuse		
		7318.22	Sponge seal		
		7320.10	Surge absorbers		
		7320.20	ばね		
		8310.00	サインプレート		
		(8443.99)	Tape cartridge		原産(マレーシア) Form A(マレーシア発給)
		(8501.10)	モーター		原産(マレーシア) Form A(マレーシア発給)
		(8505.19)	フェライトコア		原産(マレーシア) Form A(マレーシア発給)
		8003.00	PB free Solders(はんだ)		原産(日本) サグイヤ 説明書(●●製作所A工場)
					原産(日本) サグイヤ 説明書(OO株式会社A工場)
		9607.19	ファスナー(留め具)		

※【原産地規則（一般規則）】
 当該産品の生産に使用されたすべての非原産材料について、4桁番号の水曜におけるもの（すなわち、項の変更）が行われた産品。

証明書を出したサプライヤーも、納入部材に関する同様の対比表（VAを用いた場合は計算ワークシート）を作成している必要あり。

>対象産品（生産国：日本、製造場所：●●工場、仕向地：タイ）

作成日：〇年〇月〇日

HSコード	産品名	FOB価格(出荷価格)	FOB価格(円換算)	付加価値	非原産材料価格	原産資格割合	関税
8544.30	ワイヤハーネス	\$64	¥5,800	¥4,400	¥1,400	69%	40%

>原材料等の構成（※HSコードの記載は省略可）

HSコード	部品名	原産/非原産	原産情報	価額情報
(8443.99)	Tape cartridge	原産(マレーシア)	原産(マレーシア)	1,400
(8501.10)	モーター	原産(マレーシア)	原産(マレーシア)	1,400
(8505.19)	フェライトコア	原産(マレーシア)	原産(マレーシア)	1,400
(8532.29)	LED	原産(日本)	原産(日本)	1,400
(8544.11)	銅線	原産(日本)	原産(日本)	1,400

・単純に使用した部材のHS番号が製品と比較して変更していることを確認できればよい。

・製造工程フロー図や生産比率等により、材料が全て確認できれば、非原産材料の割合は必ずしも40%以上である必要はない。

・原産材料については、HSコードの記載は原則不要。

・原産材料であっても、当該部材のHS番号が製品と比較して変更していることが確認できれば、非原産とみなしてよい。

・協定上の計算式（控除方式）には、原産材料の価額は出てこないため、控除方式を用いる限り原産材料単価の立証は不要だが計算がより簡便になるかを判断。

・非原産材料価額は、協定上の「CIF又はfirst ascertainable price」とされているところ、在産と異なる日産価格の材料が所在している場合も入庫時の日産価格を振り出す必要はないと考えられる。

・材料単価決定方式は、各企業の採用する会計基準に基づいて異なる。ただし、実際の購入単価を定量的に確認し、その妥当性を立証していることを求められる。

・協定となる日々の在産について、原産地当該書類の所在を在産として関係部署から請求し、関係部署から提出できるような社内体制を整えておくこと。

比較してHS番号が変更していることを確認!

HS# and name of all components

points to be considered in examination

HS# and name of exporting good

name and FOB value of exporting good

VA calculation result

name, cost and originating status of all components

list of supporting documents

Challenge#2: Improving Compliance levels (cont'd)

3. Holding seminars on ROO (METI, Chambers of Commerce)

- For all industries (biannual, mainly for company CO officials)
Contents: basic concept of EPA/FTA, and ROO, overall certification procedures, important points in examining originating status.
- For specific industries (on their request)
Contents vary with their specific needs.

4. Other measures

- Providing general information on the Web (FAQs, brochures)
- Taking specific inquiries (telephone/email)
e.g. overall procedure to get COs , techniques to verify the originating status, interpretations of specific ROOs
- Troubleshooting

What We've Learned

Applying for an approved exporter is a good opportunity to make the exporter *review* its compliance level.

- whether examination/certification process are appropriate
- whether human resources/oversight system are properly set

Setting clearer compliance requirements makes the approval process more *foreseeable* to all exporters

- Ideas about “*what should be done*” and “*to what extend*”
- Guidelines, seminars are useful way for improvement

→ Introducing self-certification system while providing supports for improving compliance makes exporters more reliable.