

# TECHNICAL COMMUNIQUE



TECHNICAL BULLETIN FOR NASAA CERTIFIED ORGANIC



## USDA NOP Approvals for Input Manufacturers

**Inputs certified by NASAA Certified Organic are assessed against the NASAA Organic Standard and the National Standard for Organic and Biodynamic Produce.**

These inputs are not assessed against other standards e.g. USDA NOP. Primary Producers certified to the USDA NOP Program are required to use input products compliant with the USDA NOP Program. Two important points for Input Manufacturers:

- 1] NCO offers assessment of input products to the USDA NOP Standards. Upon successful assessment, an approval letter is issued for 12 months. The USDA NOP Approval will need to be renewed every 12 months or at the time of change of ingredients/process, whichever is earlier. If you want to get products assessed against the USDA NOP Standards, please contact the NCO Office.
- 2] For Input Manufacturers who currently hold USDA NOP Compliance Letter, the approval for inputs must be renewed at the time of annual update/inspection.

## NCO Inputs Directory 2017

**We have issued the annual NCO Inputs Directory 2017.**

Click here to download the **directory of inputs form**

Operators wishing to use a non-certified input must provide the following product information to allow NCO staff to evaluate the product:

- 1] MSDS and/or Product Information Sheet
- 2] Label
- 3] GMO Statement (if relevant)
- 4] Further information (if needed, e.g. processing/extraction methods).

## Notification to NCO re: contamination

**It is a requirement of the NASAA Organic Standards and the NCO Operator Contract that operators must notify NCO if the Licensee's facility or the specified products or processes are contaminated or potentially contaminated by any substance or method not specifically allowed under the relevant Standard.**



## Conversion periods for dairy cows

**Please note this document must be read in conjunction with the NASAA Organic and Biodynamic Standard.**

Please take the time to understand these requirements regarding the certification status of cows and milk:

- 1] When an operator commences the organic conversion process any existing Dairy Cows can never be certified, however their milk is eligible for certification (at the same level as held by the certified production unit) after complying with organic conversion requirements.
- 2] Note that any animals that are held on land that is progressing to certification or is certified must be managed according to the Standard, i.e. no conventional treatment is permitted unless the quarantine requirements of the Standard are fulfilled.
- 3] In addition to being managed, i.e. handled and treated according to the Standard while held on the converting or certified land, dairy cows require 100% of their diet to be sourced from feed that meets the Standard for a period of at least 180 days before milk can be certified.

## Conversion periods for dairy cows (Cont.)

The certification status of the milk at the time the 180 day period has elapsed will be dependent on the certification status of land and of the feed. For example, if land is fully certified, then:

- a) For milk to be fully certified feed must be sourced from fully certified pasture, hay, silage, grain, feed rations, etc.
- b) Feeding any portion of in-conversion feed will result in the labelling of milk as in-conversion except where that feed has been produced from the same land during the in-conversion period. In this instance this stored feed may be fed to the dairy cows without the milk losing organic status



## Livestock nutrition: clarification regarding the 5% feed supplement derogation

### NOS 6.5.7:

*Feed supplements of agricultural origin must be of certified organic or biodynamic origin.*

### DEROGATION:

*If organic agricultural feed or feed supplements are unavailable, application may be made for provision to feed up to 5% of the animal diet (calculated on an annual basis) with non-organic agricultural supplements provided it does not contain prohibited substances.*

**It has been discovered that currently the 5% feed supplement derogation is being applied by some operators in a manner not consistent with the intent of the derogation.**

The derogation wording is for “feed supplement”, which under both the NASAA and National Standard definition means: “a component added to correct or overcome a deficiency or to prevent the development of a deficiency”.

The derogation condition was never intended to be used for conventional grain as a top-up with organic grain. Rather, it is much like the National Standard labelling rule which clearly states: “The same ingredient may not be derived from an organic/bio-dynamic source, and a source not complying with this Standard”.

Operators wishing to apply for this derogation need to note that the 5% derogation is not to be used as a “conventional top up” for the same organic product.

Certification Staff and Inspectors have already been briefed regarding this practice and any operators found performing conventional “top up” practice will be issued with a non-compliance.

Note that the above 5% Derogation is a separate issue to the NOS 6.5.14 derogation which reads: “In the event that 95% or more of organic feed sources are not available as a result of drought or other natural disaster, and after notification, feeds may be of non-organic origin, provided that they do not contain substances listed in this Standard as prohibited. In such an event, full organic livestock status may be regained in 6 months from the cessation of such practice. Tissue tests may be required. This derogation should be read in relation to importing country requirements.”

## Clarification on use of injectable vitamins

**Under NOS 6.5.12, the use of natural vitamins as part of a livestock diet is permitted.**

Vitamins from non-natural sources (i.e. synthesised) are restricted in use (Table 5), and evidence must be supplied to show that the vitamin cannot be sourced in sufficient quantity and quality from natural sources. The intent of the Standard is for the stock needs to be met through nutrition and management.

Only where management and feeding has proven insufficient to meet stock vitamin requirements can a derogation request be made for the use of injectable vitamins.

Approval for use will be conditional on the following:

- 1] Product being free from substances not permitted under the Standard, and
- 2] Development and implementation of a management plan that removes reliance on use of injectable vitamins.

## Scope of certification and Organic Produce Certificates (OPCs)/Export Certificates

**As a part of the OPC/Export Certificates validation process, NCO verifies that products to be exported are included in the scope of certification.**

If the product is not listed in your organic management plan, Inspection Report, and the Contract Schedule, NCO will not approve the export certificate. If you are exporting or intending to supply an exporter please make sure products are specifically listed on your certificate.

Operators are required to complete an extension of scope application to add any specific products.

Further for our exporters using OPC's; we would like to inform you that your OPC numbers will soon be issued electronically via a new log-in system on our NCO web page. We will be notifying you via email when this system is active.

## Irrigation channels and Arrowhead Weed management

It has come to NCO's attention that public irrigation channels that run through certified organic properties may have been sprayed with prohibited herbicides to control weeds like Arrowhead Weed. Use of water from these channels may affect the certification status of land and/or animals.

You will be required to conduct a risk assessment on the water from the irrigation channels. This risk assessment will need to be made available to NCO and should cover the following points:

- 1] How you intend to implement strategies to prevent contamination to your land and your livestock during spray events. Strategies include:
  - a) Records of spray events, supported by documentation from the water authorities
  - b) Specific withholding periods
  - c) Management plans in the case of adverse accidental contamination
  - d) Irrigation diary with entries of the dates when the property was irrigated
  - e) Where livestock are contained during these events and when they are allowed access to the channels (supported with diary entries)

- 2] Water sampling reports for residual herbicides
- 3] Request a report from the relevant Water Authority about the water suitability for potable or livestock use
- 4] Alternative allowed methods of managing the weed on your property

For new applicants entering the system, these spray events may impact on the certification status of your land and/or livestock. Therefore it is imperative that good records of these events are kept and supplied to NCO upon request.

## New NCO derogation forms

**NCO has streamlined the derogation application process by reducing the multiple derogation application forms to two major types of applications:**

- 1] This includes application for the following: non-organic seeds and/or seedlings, feed, vitamins, mushroom spawn, and other similar derogations..
- 2] This includes application for the following: reduction of conversion period, whole of farm not converting at same time, government authority statutory action plan, use of synthetic unwoven plastic mulch, feeding and/or relocation of bee hives, and other similar derogation applications.

Click here to download the [Input Derogation Request form](#)

Click here to download the [Management Derogation Request form](#)

## Mulesing under the IFOAM Program



**For operators certified to the IFOAM program, the practice of mulesing is not permitted. Please refer to the IFOAM additional requirements on our website.**

Click here to download the [IFOAM Program Additional Operator Requirements form](#)

**All feedback and suggestions to this Technical Communiqué are welcome and can be sent to:**

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