



Dear NCO Operator,

The November 2019 NASAA Certified Organic Technical Communique contains a range of information designed to assist you in navigating your certified organic requirements. Please take the time to peruse the articles below and if you would like further information on any area covered please do not hesitate to contact the [NCO office](#). We are always pleased to assist you and welcome any feedback.

The Australian organic industry is continuing to grow and NCO is proud to support so many operators who share our commitment to healthy choices and a cleaner, sustainable environment for all future generations.

Tammy Partridge
General Manager
NASAA Certified Organic

OMP/OHP Updates

During the 2018 and 2019 year, all operators were required to complete a new Organic Management Plan (OMP/OHP) to bring them all up to date and reflective of the actual organic management practices.

This document is a living document so any changes that need to be made in the future should be made directly into this document and resubmitted.

And that results in 'Less paperwork!'



Export Requirements

What is the difference between an OPC, a COI and a TC?

OPC (Organic Produce Certificate) - an Australian Government Export Document that must accompany any organic or biodynamic shipment of Australian produce.

COI (Certificate of Inspection) - an importing country requirement for the European Union and Switzerland. It is generated electronically via the European Union Traces database for any product entering the European Union or Switzerland.

TC (Transaction Certificate) - a document generated by NCO to accompany any organic or biodynamic shipment of international produce. It takes the place of an OPC for NCO's internationally situated certified operators.

All produce making claims of organic certification and being exported from Australia must be accompanied by an Australian Government Organic Produce (Export) Certificate (OPC) regardless of its destination. This is a legal document that NCO is authorised to issue on behalf of the Australian Government.

OPC's, COI's and TC's should be issued prior to the consignment/shipment departing Australia. This is critically important to ensure that consignments are not held up on arrival incurring storage charges or rejected and returned to the exporter.

If you are planning on Exporting for the first time or you are an existing exporter with additional questions, please talk to Jennipher Vivian at NASAA certified Organic on 08 7231 7700 or email exports@ncocertifiedorganic.com.au.



JAS Livestock

The JAS law change of organic livestock products from July 2020

Currently, only plants and plants base processed foods are regulated for organic labelling in Japan, and any plants based organic products must be sold with the organic JAS certification and JAS logo. Due to the recent increase of organic livestock products in the Japanese market, MAFF (Minister of Agriculture, Forestry and Fisheries – Japan) have decided to apply JAS livestock regulations and labelling restriction for organic livestock products and organic processed foods including livestock material. From July 2020, those products must be also JAS certified and JAS labelled to be sold as organic.

Under current arrangements, Japan and Australia have the equivalency agreement for organic plants base products and this system allows Australian certified organic products to be sold in Japan with JAS logo affixed by JAS certified Japanese importers. The equivalency for organic livestock products is also under discussion between the two countries, and once it is agreed, organic livestock products can be also sold in the same manner without the need for direct JAS certification. MAFF received much feedback requesting equivalency arrangement through public comments in August 2019, therefore, MAFF pushed back the law change from the original plan of April to July 2020. NCO keeps in touch with the Department of Agriculture (DoA) for updates on any progress in the equivalency discussion with Japan.

NCO is accredited directly by MAFF and can conduct JAS Livestock certification. If the Australian equivalency agreement is not achieved by July 2020, NCO will work with any

affected livestock operators to prepare application of JAS certification, preferably at the same time as the annual inspection. If the equivalency is achieved, JAS certification is not required for Australian operators but it is important to make sure that the Japanese importer has JAS certification. (Note: JAS mark can be affixed in Australia with agreements with the JAS certified importer.)

If you have any questions, please contact NASAA Certified Organics' JAS Liaison Officer, Haruyo Sakai on (08) 7231 7700 or Haruyo.sakai@ncocertifiedorganic.com.au.



Varying Inspection Times

There is a requirement under all certification programs that an operator is subject to re-inspection annually. If an inspection occurs later than 12 months, this is deemed a non-compliance. Therefore dates of inspections are usually scheduled around the inspection timing of the previous year.

There are many important factors that tie in to your inspection. For example, accreditation wants to see an operation when it is in full swing ie: at your most productive time. However, we understand when you're at your busiest this is usually a very stressful time. For this reason, we do try to find a happy medium; a time that ensures we can verify what is written in your OMP and also when the operators can give us their full attention.

NASAA Certified Organic doesn't always know when you're at your busiest, so we are happy for you to contact us to ask if your inspection time can be varied. We do organise inspections in runs of multiple operators at similar locations, minimising costs for our operators. Therefore advance notice is required allowing us to schedule you for an earlier run to ensure you remain compliant. Requirements for advance notice are at least three months, as inspections are allocated to the auditors quarterly. Last minute cancellations are subject to cancellation fees.



Update on Import conditions for brassicaceous crop seed

The Department of Agriculture has completed its review of import conditions for brassicaceous vegetable seeds for sowing and has published the final report. This review is the first of four vegetable families to be finalised.

The Summary of the report found that whilst the majority of brassicaceous vegetable seedlings are not hosts of pathogens that are of biosecurity concern to Australia and therefore, do not require additional biosecurity measures, seeds of some brassicaceous vegetables are. Therefore *Brassica rapa*, *Raphanus sativus* and *Eruca vesicaria* will require additional biosecurity measures to manage the risk and these include Fungicide, heat treatments and/or testing.

Full details of final report available here:

<http://agriculture.gov.au/biosecurity/risk-analysis/plant/brassicaceous-crop-seeds>

Phase 1 Commences 5 Dec 2019. There is an organic option of heat treatment available for *Brassica rapa* (e.g. turnips and bok choy) , but *Raphanus sativus* (e.g. radish) & *Eruca*

vesicaria (e.g. rocket) will need to be fumigated until Phase 2 is implemented - no date provided as yet until a satisfactory PCR (polymerase Chain Reaction) test to detect the presence of pathogens has been developed.

The Australian Government's Biosecurity Import Conditions database [BICON](#) will be updated at this time.

Any organic operation that uses any of the above species for for sprouting or microgreens, can apply to the department for an exemption to the seed treatment requirement. However, any such premises conducting these activities will need to be assessed and authorised by Department under an approved arrangement ie the site is assessed against specific quality requirements (a 90-120 day assessment process). Further information about this process is available here:

<http://www.agriculture.gov.au/import/arrival/arrangements/applying#further-information>

Update on the PyGanic® contamination issue

Further to our notification released by NCO on 9th July 2019, the Certification Bodies have conducted extensive testing on organic product deemed to have been at risk from contamination. The residue test results displayed nil detections.

Sumitomo are currently manufacturing new batches of Pyganic®, however in the meantime batch number AA1948, that was under recall has now been allowed back on the market following a risk assessment and testing.

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