



Australian Organic Industry – Fire Crisis Update

What Certified Operators need to know

As Australia comes to grips with the worst bushfire season in living memory, our thoughts are with those affected. While it is unclear how many certified organic operators have been affected, we would like to take the opportunity to remind operators of some of the requirements for certification which may become relevant for these operators for the first time, and to alert you to some of the allowances and derogations that are available in the National Standard for Organic and Bio-Dynamic Produce 3.7 (NS), and the Australian Certified Organic Standard 2019 (ACOS), to ease the burden of certification in emergency situations such as these. Please note that clauses denoted as derogations, require specific approval from your certification body, prior to enacting on your operation. The advice provided below is general in nature, and if you have any queries please contact your certification body.

Fire Retardant – Potential for Chemical contamination of land or produce

Fire-fighting efforts are facilitated by the use of a range of fire-retardant chemicals, which may impact organic properties and lands in affected areas. Many of these chemicals are prohibited inputs according to the Australian Certified Organic Standard 2019, and the National Standard for Organic and Bio-dynamic Produce 3.7. If you think your property may have been contaminated, please refer to the Australian Organic General Guidance in the link below.

https://austorganic.com/wp-content/uploads/2019/12/AOL_ACOS_2019_Notification_1905.pdf

Livestock Feed

Emergency feeding allowances are made in the National Standard, as follows (appearing below section 1.16.9):

Derogation

In situations of extreme climatic or other extenuating circumstances (such as fires, floods, etc) an exemption for the feeding of organic/bio-dynamic feedstuff to certified livestock might be granted by the approved certifying organisation. In such a situation:

- *where in-conversion feed is sourced, the organic or bio-dynamic status of the livestock is unaffected.*
- *livestock receiving feed that does not comply with this Standard must be fed on feed complying with this Standard for a consecutive six-month period before regaining organic or bio-dynamic status. Residue testing of certified livestock by-products maybe required before any organic or bio-dynamic status is regained.*

This derogation in the National Standard allows for emergency feeding with non-organic feed, with affected livestock (and their byproducts such as milk or eggs) temporarily losing their organic status, until the stock have been back on organic feed for a period of a six months. ACOS 5.1.36 reflects the same requirement. The derogation does not specify a maximum timeframe for feeding with non-organic feed, but it is assumed that this period should be brief.





Livestock Re-stocking

We expect that sadly, some livestock may have been lost, grazing areas de-stocked, or herd numbers reduced. If you are planning to re-stock, certified organic animals are generally required, however the following allowance is made by the National Standard (appearing below section 1.14.3):

Derogation

Where an operator can demonstrate that certified sources of livestock are not available, conventionally produced livestock may be introduced on to the production unit. Conversion requirements for such livestock product to be sold as organic, bio-dynamic or in-conversion are listed in Table 1

Please refer to Table 1, on page 23 of the National Standard for conversion periods for different classes of livestock. Similar requirements are detailed in ACOS section 5.1.11, and Table 5b.

Honey Production

We expect honey producers may have been some of the hardest hit by these fires. Loads of hives may need to be moved to non-organic sites to ensure welfare of the bees, or additional supplementary feeding may be required to replace burnt forage sources. The National Standard allows for this, as follows:

1.23.6. Feeding of hives is only allowed under extreme climatic or other extenuating circumstances and in such cases, only organic honey tested free of American Foul Brood disease or organic sugar can be used.

Derogation

The operator must seek permission from the approved certifying organisation to allow:

- *the use of honey not produced in accordance with this Standard and/or*
- *re-locate hives to sites not complying with 1.23.2.*
- *After such an event, the first extraction cannot be not sold as organic or bio-dynamic.*

ACOS 7.1.12-7.1.15 reflects these requirements.

Replanting

Organic plants must be grown from organic seed or organic plant propagation material. However, as most operators are probably already aware, the following allowance for non organic seed or planting material is made (below section 1.7.2):

Derogation

Where an operator can demonstrate to the approved certifying organisation that material satisfying 1.7.2 is not available in sufficient quality and quantity, the operator must seek written approval from the approved certification organisation to use seed or vegetative reproductive material not in accordance with this Standard.

ACOS 4.2.11 reflects these requirements.



Replacement infrastructure

Where infrastructure such as fences or trellis posts have been lost, we remind operators that while pre-existing treated timber posts can be acceptable, the use of new timbers treated with prohibited materials is generally not allowed by Australian due to the risk of contamination that such timbers introduce.

In all instances of derogations, the certified operator must seek approval from their certification organisation. Derogations must be issued by your certifier prior to taking action.

Please ensure you contact your certification body should you have questions relating to your certification requirements.

