



Australian Certified Organic Standard

Feed Derogation Explanatory Note

There are many cases where organic standard setters or scheme owners have agreed to allow certain practices or inputs to encourage establishment and growth of the industry, while making available practical or more achievable options for growers and manufacturers interested in converting to organic methods. We believe this particular drought derogation fits into this category, as an appropriate temporary measure to continue to strive for the same goal. Organic standard setters are in the business of setting high, but achievable rules for the industry.

Examples of such practical compromises include the following:

- Existing and ongoing 5% non-organic allowance for livestock feed (it is interesting to note that the USDA National Organic Program does not include such allowance);
- The new JAS Livestock standard allows up to 15% of non-organic feed;
- 5% allowance for non-organic ingredients in processed multi ingredient food products (the US are again leading in this space, only allowing a specific list of non-organic ingredients as in 7CFR205.606. It is assumed that this list will become shorter over time);
- allowance for use of non-organic seeds (a hot topic in the industry currently);
- allowance of some synthetic adjuvants in agricultural inputs (Japan does not allow alkali extraction of humates, most of the rest of the world does);
- the allowance of synthetic methionine in feed rations (USA have set limits, and sunset clauses, most of world tending in same direction, with varying approaches).

These are many examples where organic standard setters or scheme owners have sought to **strike a balance between upholding the ideals and outcomes of organic production, whilst allowing an emerging industry to grow**. What would be the point of setting a standard that is so strict, that no operators are able to comply?

Based on the current growth figures for the organic industry worldwide, it could be surmised that a suitable balance between upholding ideas, and allowing industry growth, has indeed been struck.

As climatic situations change from time to time around the world, such derogations are made available as needed.

In Europe. Article 47 of EC Regulation 889 allows for:

“Catastrophic circumstances

The competent authority may authorise on a temporary basis:



- *(c) the use of non-organic feeding stuffs for a limited period and in relation to a specific area by individual operators, when forage production is lost or when restrictions are imposed, in particular as a result of exceptional meteorological conditions, the outbreak of infectious diseases, the contamination with toxic substances, or as a consequence of fires(...)*

Internationally, the International Federation of Organic Agriculture Movements (IFOAM) allows in 5.5.1:

“operators may feed a limited percentage of non-organic feed under specific conditions in the following cases: a. organic feed is of inadequate quantity or quality; b. areas where organic agriculture is in early stages of development; c. grazing of non-organic grass or vegetation during seasonal migration. In no such case may the percentage of non-organic feed exceed 10% dry matter per ruminant and 15% dry matter per non-ruminant calculated on an annual basis.

Operators may feed a higher percentage of non-organic feed for a limited time under specific conditions, following extreme and exceptional weather conditions or manmade or natural disasters beyond the control of the operator.”

In the US, “temporary variances” to the pasture requirements are often issued, and in Europe, exemptions to pasture intake minimums, and organic supplementary feed rules are also provided.

While we agree that the drought derogation is “less than ideal”, and also that we are moving away from “ideal”, however when faced with the seriousness of the feed availability situation in Australia, and with thorough assessment and consideration, we have judged that this allowance is necessary to maintain the balance. We believe this short-term derogation will support the long-term viability of certified organic operators in Australia.

The certification bodies verify the operator has met the below requirements:

- Have not been able to source organic or in conversion feed in quantities sufficient to maintain health of certified livestock.
- Am currently experiencing prolonged or severe drought (or other extreme climatic conditions), as declared by the relevant state government department.
- Understand that the upper daily limit of 25% based on dry matter mass applies.
- Is not contaminated and non-GMO