

CERTIFICATION CLAIMS DURING THE CONVERSION PROCESS



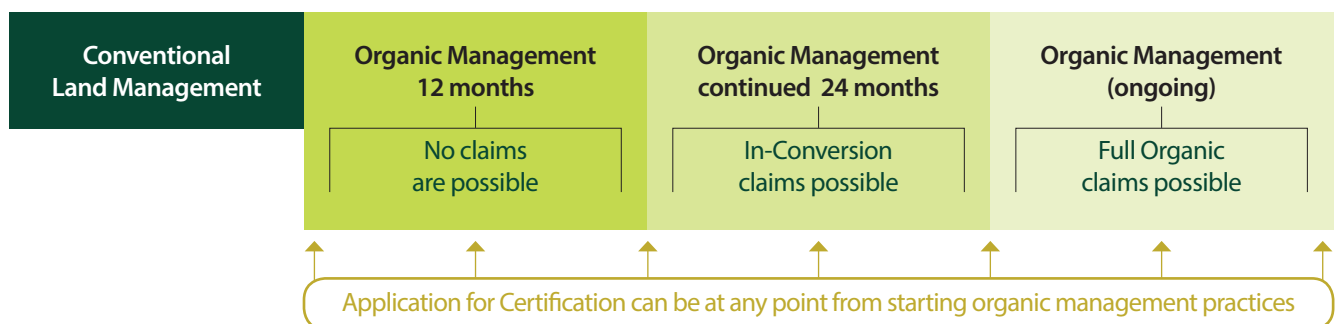
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The explanations below are simple summaries of the more detailed requirements found within the *NASAA Organic and Biodynamic Standard (NOS)* and the *National Standard for Organic and Biodynamic Produce (NS)*. Please refer to these Standards when considering how this information specifically applies to your situation.

1. General (Land) Requirement

- 1.1 The requirements of the Organic Standard must have been applied to the land (production unit) for at least three years before products can be certified (therefore labelled and sold) as organic.
- 1.2 The requirements of the Organic Standard must have been applied to the land for at least one year before products can be certified as in-conversion.

The following diagram reflects requirements described above:



Explanation of Land and Organic Conversion Claims:

- a. The start of the organic management period shall be calculated from the date NCO inspection of the operation takes place unless the applicant can provide sound and incontrovertible evidence of compliance with the Standards during the period prior to the inspection.
 - b. Even where an applicant can demonstrate long term compliance with Organic Standard requirements prior to making an application for organic certification, produce during the first year under the certification system can only be labelled as in-conversion.
- > Where application is made at or soon after commencing organic management, in-conversion certification cannot be granted until after the first 12 month period has been reached.
 - > Where application is made after at least a year of organic management, then PROVIDED the operator can supply enough evidence to PROVE the requirements of the NS & NOS Standards have been met, in-conversion certification may be granted after the initial inspection report has been reviewed.
 - > Where application is made after at least a year of organic management AND the operator is unable to provide sufficient evidence to prove that the requirements of the NS & NOS have been met, then the production area will not be eligible for in-conversion certification. In such a situation, depending on particular circumstances for this decision, the operator may be required to develop and/or improve their management system so as to meet NS & NOS requirements. In-conversion certification will be granted once 12 months under the improved/amended conditions have been met.

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2. Conversion of Plant Products

- 2.1** Organic Crop production (this term includes broad acre cropping, pasture and horticultural products) must be a soil based activity.
- 2.2** Crops can only carry the same level of certification as that held by the land the product is grown on.
- 2.3** Seeds, seedlings and plant propagative material are to be sourced from organic production. A derogation may be requested to source non-organic material, but supporting evidence must demonstrate that the required planting material is not available from organic sources. Non-organic material should be from untreated sources. Where treated material is the only option, the operator must have a risk management in place to prevent contamination of land and/or end product. Where this cannot be effectively managed, the land and/or product will lose its organic status.

3. Conversion of Livestock Products

- 3.1** Any livestock kept on organically managed land (production units) must be managed according to the requirements of the Organic Standard if the land is to maintain its organic status. This includes a stock rotational management program, and includes quarantining any stock treated with non-permitted substances.

Where stock running on organic land are not managed (handled and treated) organically, the land will lose its organic status.

- 3.2** Livestock that have not been managed organically from at least the last trimester before birth or from hatching may not be sold with organic claims. Neither may their meat be sold with organic claims. Milk & wool product may be sold with organic claims after meeting specific conversion conditions. Eggs and poultry meat may carry organic claims provided the birds are fed and managed organically from at least 2 days of age.
- 3.3** Organic Livestock production is a free-range and pasture based activity, therefore livestock products can only carry the same certification status as currently held by the production unit.

- 3.4** For livestock products to make organic claims, the diet must comprise 100% feed complying with the Organic Standard.
- 3.5** Feeding any portion of in-conversion feed will result in the labelling of animal products as in-conversion except where that feed has been produced from the same production unit during the in-conversion period. In this instance own stored in-conversion feed may be fed to organic livestock without them losing their organic status.
- 3.6** If required feed supplements are not available from organic sources, an exemption may be sought to provide up to 5% supplement from non-agricultural sources or from non organic ingredients. The same ingredient may not be derived from an organic source and a source not complying with the Organic Standard.

Feed supplements must not contain prohibited substances and must not be derived from prohibited processing practices.

Explanation of Livestock Product Conversion

Using Dairy Milk Production as an example:

- a. When an operator commences organic land management practices any stock that run on the converting production unit must be handled and treated according to Organic requirements. If the stock are not so managed, the land conversion process is nullified.
- b. Any existing dairy stock, even when handled and treated organically, can never be certified, neither can their meat product. However their milk is eligible for certification (at the same level as held by the certified production unit) 180 days (six months) from when the animal has been placed on a diet that complies 100% with the requirements of the Organic Standard.

Conversion of Livestock Products continued page 3.

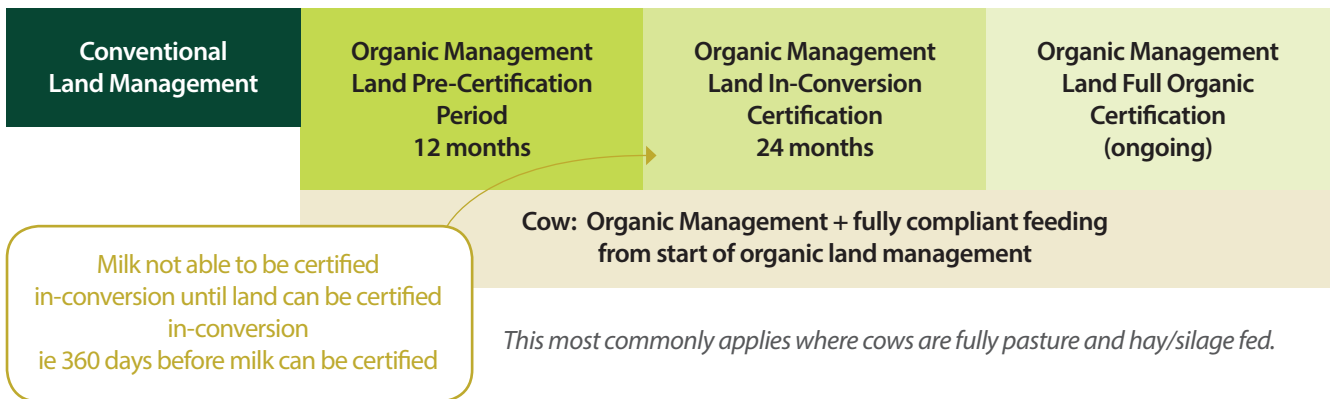
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3. Conversion of Livestock Products *continued*

If we continue with use of the same diagram shown under LAND CONVERSION REQUIREMENTS and now overlay management requirements for milk to be certified, we get the following picture:

Example A:

Cows and Land convert at the same time

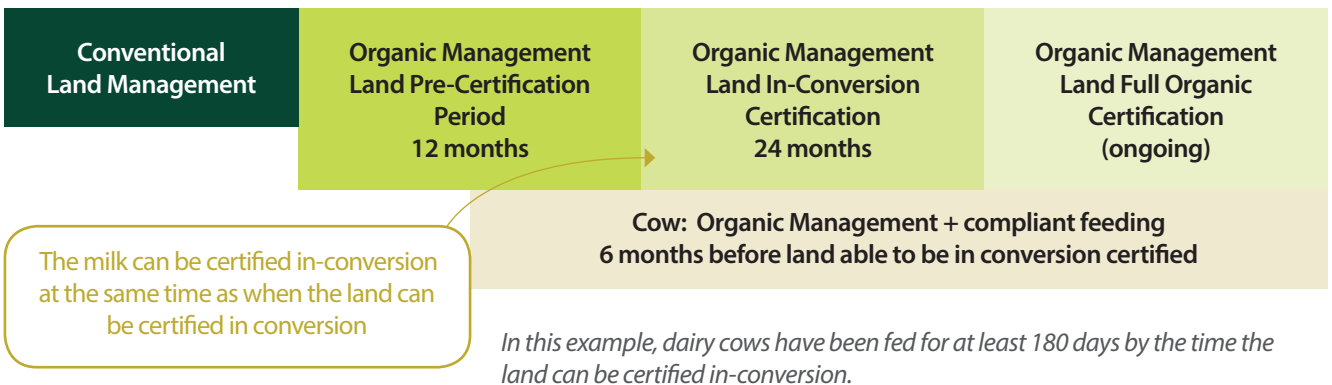


Example B:

Delayed start to 100% of cow diet from sources that meet Organic Standard requirements

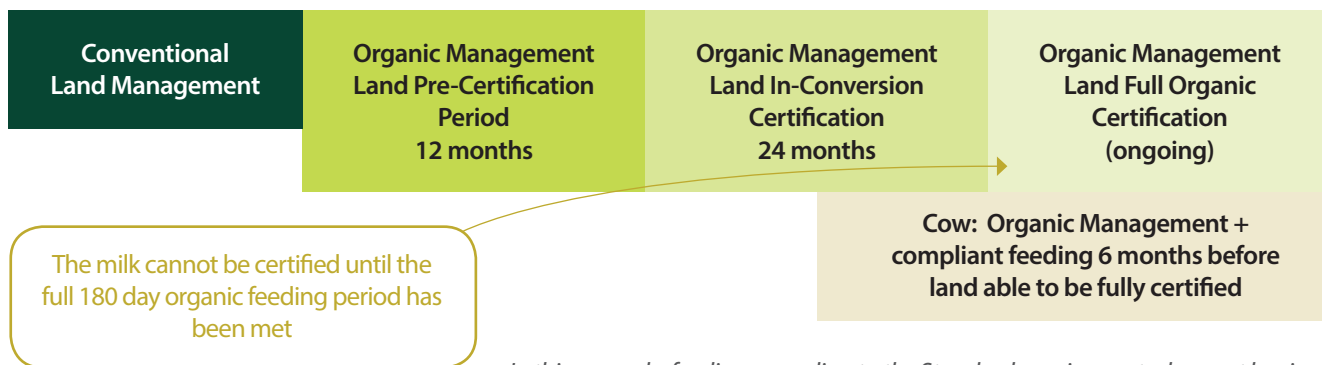
Depending on the land conversion phase, along with when the feed supplied to cows fully complies with Organic requirements, will determine when the milk can be certified:

If part of the dairy ration consists of purchased feed eg either grain, hay/silage that does not comply with standard requirements, the 180 day period required for milk to be certified ONLY COMMENCES ONCE PURCHASED FEED IS SOURCED FROM COMPLIANT PRODUCTS AND FED TO THE COWS FOR AT LEAST A 180 DAY PERIOD.



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3. Conversion of Livestock Products *continued*



In this example, feeding according to the Standard requirements does not begin until 30 months after the land is placed under organic management. Although the cows commence feeding according to the Standard requirements while the land is certified in-conversion, the 180 day requirement for milk needs to be met before milk can be certified.

Other factors to Consider:

- > Where farm management includes the use of leased land or out blocks/property for running heifers and/or dry cows, this land will also need to be managed under the conditions required for organic certification. If it is not, then such land cannot be used by dry cows, because they will not meet the 180 day organic requirement before they are ready to calve. Also any heifers that run on land not managed according to organic requirements **MUST** be placed under organic conditions 6 months before their first calf if that milk is to be included under organic certification.
- > Operators who purchase outside feed sources must be able to provide enough evidence to the NCO office and to the NCO inspector (who must verify this during the inspection) that dairy cows have been managed and fed according to the Standard requirements for at least 180 days before milk can receive the same level of certification that is held by the land/production unit. Therefore, records must show and supporting information be provided to NCO office of exact dates when any non-permitted treatments were applied to animals and/or when conventional feed was last used.



This Information Sheet is developed specifically for operators certified under any of the NCO organic certification schemes. It contains information about organic protocols and procedures. The information should be read in conjunction with the NASAA Organic & Biodynamic Standards. While every effort has been made to ensure the accuracy and currency of information within this information sheet, NCO accepts no responsibility for information, which may later prove to be misrepresented or inaccurate, or reliance placed on that information by readers. For further information contact NCO Certification Officer or email to info@nasaa.com.au