



New Export Certificates Requirement for Products Exported to the EU

For products exported to the EU from Australia and international destination a new Export Certificate (Certificate of Inspection) system called TRACES (TRAde Control and Expert System) has been introduced by the European Commission.

E-Col (Electronic Certificate of Inspection) will be mandatory from 19 October 2017 to issue and endorse Certificate of Inspection for organic products exported into the EU. The TRACES system is operational and under trial since April 2017 – 19 October 2017.

To be able to obtain a Certificate of Inspection, Importers, Exporters, and Consignees must be registered under the TRACES Portal. NCO will issue a specific notification to operators exporting to Europe.

We will also organise a guidance session by Skype/Phone for personnel responsible for obtaining export certificates.

Please contact the NCO Office for any further information on TRACES.

Change to Organic Certification Requirements for Meat Export to Taiwan

Taiwan's Council of Agriculture (COA) has advised that organic certifying bodies must provide additional attestations for organic meat, meat products and processed meat products exported to Taiwan

[Click here to read more](#)

Therefore, the requirement applies to products such as chicken broth, beef broth and sausage, but does not apply to other animal products such as milk, cheese and eggs.

The attestation needs to state the following:

Australian origin organic agricultural products and organic processed products were produced or processed in accordance with the National Standard for Organic and Bio-Dynamic Produce. Australian origin organic livestock for meat products exported to Taiwan were managed without the use of chemically synthesised allopathic veterinary medical products.

In other words, livestock intended for export to Taiwan must be managed without the use of allopathic veterinary medicines. This means substance(s) used to treat disease that produce a reaction or effects different from those caused by the disease itself. Vaccines, however, are only permitted where necessary and legitimate and the operator can demonstrate that management practices are insufficient to guard against disease and illness (NS 1.17.7).

The attestation is to be provided on a document issued by NCO and is separate to the Department of Agriculture and Water Resources' Organic Produce Certificate (OPC). The attestation document must cross-reference the OPC number and also accompany the OPC.

In order for NCO to generate the attestation, an exporter is required to submit a signed Declaration confirming the attestation details are correct for the shipment in question.

A sample Exporter Declaration is provided in the Information Sheet: Exporter Guidelines Export Certificate (Attachment D of IS 8.10_Organic Export Certificates Guidelines for Exporters).

This can be found on the NCO website at the link here.

A reminder for Operators certified to the USDA NOP program:

On the 19 June 2017, the following notification was sent to all Operators certified to the USDA NOP program.

As a result of our accreditation audit by the USDA, we are making the following changes to the USDA NOP program:

1

Anniversary Date on the USDA NOP Certificate:

As per the USDA NOP requirements, USDA NOP certificates cannot include an Expiration Date.

However, the USDA NOP certificate must have an Anniversary Date. This is the date when the certified operation must submit its annual Organic Management/ Handling/Systems Plan Update. NCO USDA NOP certificates issued after 01 July 2017 will include the Anniversary Date.

Operators certified to the USDA NOP program must submit their annual Organic Management/Handling/Systems Plan Update prior to the anniversary date on the certificate.

Failure to submit prior to the anniversary date will result in Non-Compliance.

2

Comprehensive Organic Management/ Handling/Systems Plans:

As per the USDA NOP requirements, each year, the Operator must submit to its certifier (NCO):

- 1] Certification and inspection fees;
- 2] Updated contact information;
- 3] Any changes that the operation made during the previous year;
- 4] Any changes that are planned for the upcoming year;
- 5] An update on the correction of any previously identified Non-Compliances; and
- 6] Other information deemed necessary by the certifier to demonstrate compliance with the regulations.

NCO Operators certified to the USDA NOP program will be required to complete a Comprehensive Organic Systems Plan every three years starting from 01 July 2017.

During 2017-2018 all USDA NOP certified operators will be required to complete the Comprehensive USDA NOP Organic Systems Plan.

3

Sublicense arrangement is not allowed under the USDA NOP program

As per the USDA NOP requirements, Certifying agents must identify only one "person" (typically a farm or business as defined in 7CFR § 205.2) on the organic certificate; this "person" must be certified organic.

Each certified organic operation must have its own organic certificate. Contract processors must be certified under their own right to be able to process USDA NOP product.

The sub-licences currently certified under the USDA NOP program must be certified under their own right. NCO will work with operators to implement this change over the next 12 months.

4

Access to the current version of the USDA NOP Standards

It is requirement under USDA NOP standards that operators have access to the current version of the standards. Please make sure you have access to the current standards. This is verified at the annual onsite inspection.

The USDA NOP Regulation and Program Handbook is available here.

5

Non-Compliant Uddermint Products

As per USDA National Organic Program notification under the procedures of NOP 3012 received on 19.08.17, the products Uddermint and Uddermint Green products that contain the ingredient ethylhexylglycerin do not comply with the USDA organic regulations for excipients at section 205.603(f).

Uddermint products may have been previously approved by some certifiers based on an incomplete disclosure of ingredients.

Operators are advised to immediately cease the use of these products until further notice. If in doubt about the compliance of any udder treatments please contact the NCO Office.

6

Sunset Review Final Review

The U.S. Department of Agriculture's (USDA) Agricultural Marketing Service (AMS) has published the Sunset 2017 final rule.

Removals from the National List. This final rule removes the following three synthetic substances and five nonorganic agricultural substances from the National List for use in organic production and handling.

- > Lignin sulfonate (as a floating agent in postharvest handling)
- > Furosemide
- > Magnesium carbonate
- > Chia
- > Dillweed oil
- > Frozen galangal
- > Frozen lemongrass
- > Chipotle chile peppers.

Organic forms of chia, dillweed oil, galangal, lemongrass, and Chipotle chile peppers continue to be allowed in organic products and are not affected by this action.

Renewals to the National List:

Based on public comments to the Sunset 2017 Proposed Rule, USDA is renewing the listing for three substances on the National List: inulin-oligofructose enriched, Turkish bay leaves, and whey protein concentrate. These three substances have been renewed for use in organic handling, and will be reviewed again by the NOSB as part of the 2022 Sunset review.

Click here to access the Sunset 2017 Final Rule.



NCO Inspector Health and Safety at onsite inspections

From the moment of arrival at an organic operation to completion of the inspection, the health and safety of NCO Inspectors onsite is imperative.

Operators are requested to ensure that they have undertaken risk assessments and identified existing and potential hazards for high risk areas on their property that may be visited by NCO operators inspectors.

Hazards associated with onsite inspections can include uneven or slippery surfaces, cluttered worksites, plant and equipment in operation, poor lighting and/or ventilation, areas of high pedestrian or vehicle traffic, and unsecured animals.

NCO appreciates your assistance in contributing to the continuing health and safety of our Inspectors.



Changes in JAS Standards

JAS Standards 1605 (Plants), 1606 (Processed Foods), 1607 (Feed), 1608 (Livestock) and Technical Criteria – 1831 (Processor), 1832 (Livestock Producer) have been revised effective from April 26 2017.

As per this revision, if a JAS livestock producer has difficulties sourcing JAS certified feed, they may be permitted to use organic feed that is certified to the National Standards under the Department of Agriculture and Water Resources (DAWR). Any exports of DAWR certified feed to Japan must be accompanied by an Organic Produce Certificate (OPC EX1399-01-14) as per the Export Control Orders.

JAS operators have been sent a summary of changes on 13 April 2017. The Ministry of Agriculture, Forestry and Fisheries (MAFF) released the English translation of Standards 1605 (Plants) and 1606 (Processed Foods).

These have now been uploaded on NCO's website and are available at the link here.

NCO will share the rest of translations as soon as they are issued from MAFF.



Reminder about the use of the National Organic Mark

It has been a little over one year since the National Organic Mark was launched. Operators certified to the National Standard under DAWR may be eligible to use this mark.

Although it is voluntary and free to use on products or goods containing 95% or more organic ingredients and may be used in conjunction with the NASAA label, an operator who wishes to use the mark must apply to do so.

Use of the Mark is not limited to products provided or originating in Australia. Subject to the Certified Trade Mark Rules, the Mark may be used on products that are manufactured or distributed outside Australia (1.2).

[Click here to access the National Organic Mark Trade Mark Rules.](#)

For further information on the use of the Mark please contact the NCO Office.



Use of NASAA Label for Wholesalers

NCO certified Wholesalers can now use the NASAA label on eligible certified products included in their scope of certification.

Please contact the office to get prior approval to use the NASAA label.

Boiler Additives and Organic Compliance

Recent investigation indicates that almost all commonly used boiler additives do not comply with organic principles, and their approved listing under FSANZ or FDA does not mean they can automatically be used for organic production.

National Standard clause 2.3.3 indicates:

Where products not covered by this Standard are also processed, packaged or stored, the following criterion applies.

With specific reference to the second point:

All equipment must be pre-cleaned of substances not compatible with this Standard. This may include a water rinse, or a sufficient plug (flush) of organic products which must then be diverted to the conventional market, or sufficient time for the cleaning product to volatilise.

NASAA Organic and Biodynamic Standard clause 9.6.4 reads:

The handler and processor shall take all necessary measures to prevent organic products from being contaminated by pollutants and contaminants, including the cleaning, decontamination, and if necessary disinfection of facilities and equipment.

Where boiler additives are required as part of an operation, selection criteria should include that the product(s) and/or methods are allowable under Organic Standards. Where there is no suitable permitted product/management available, the operator will need to provide the NCO office with supporting evidence to show how any non-permitted boiler additives have been removed from the system prior to organic production/processing.

The additive manufacturer should be able to provide specifications for the product which include calculations for how many flush cycles are required after the additives stop entering the boiler/steam system to ensure all traces of that additive are removed.

By submitting a sound assessment of potential additive residue levels, processing facilities may still comply with organic requirements sufficiently to remain eligible for organic certified processing.

Please contact the NCO office for further technical clarification on the conditions surrounding the use of boiler additives.



Parallel Production

Parallel production refers to the simultaneous production, preparation or handling of organic and non-organic crops, livestock and other organic products of the same or similar, visually indistinguishable varieties.

Under both the National Standards and the NASAA Organic Standards, operators are permitted to operate under parallel production on the provision that they progressively convert their farming unit over 10 years.

Upon application for certification, the operator must supply details of their parallel production area and develop a plan on how they intend to achieve this over this period.

NOS 2.6.7 The entire property must be converted to organic over a period of no more than 10 years from the date of application for certification.

Where this is not achieved the operator must provide a plan and timeline for the conversion of the entire property.

During the conversion process operators must ensure that such production is undertaken in a way that allows clear and continuous separation of all product claimed as certified or certifiable as organic (NS 1.2.5, NOS 2.6.4). After 10 years, parallel production will be assessed by NCO for acceptance on a case-by-case basis.

New NCO Information Sheets

NCO has published some new and revised information sheets on the website, under our Operator Guidelines page - click here

Click on the pages below for the full sheets...

INFO SHEET 1
NCO Composting Guidelines

Thumbnail of the 'NCO Composting Guidelines' information sheet. It features the NASAA logo and a green header. The main text is in a white box with a green border. The title 'COMPOSTING GUIDELINES' is prominent. There are sections for 'Background', 'Organic standard definitions & requirements', and 'Risk Management of Compost (off-farm)'. The footer contains the NASAA contact information.

INFO SHEET 2
Risk Management Planning

Thumbnail of the 'Risk Management Planning' information sheet. It features the NASAA logo and a green header. The main text is in a white box with a green border. The title 'RISK MANAGEMENT PLANNING' is prominent. There are sections for 'Good Farming/Manufacturing Practice', 'What exactly is a risk and how do we identify it?', and 'Steps to Risk Management Planning'. The footer contains the NASAA contact information.

INFO SHEET 3
Product Withdrawal

Thumbnail of the 'Product Withdrawal / Recall' information sheet. It features the NASAA logo and a green header. The main text is in a white box with a green border. The title 'PRODUCT WITHDRAWAL / RECALL' is prominent. There are sections for 'Developing a plan' and 'Developing a recall plan'. The footer contains the NASAA contact information.

INFO SHEET 4
Certification Claims during Conversion

Thumbnail of the 'Certification Claims during Conversion' information sheet. It features the NASAA logo and a green header. The main text is in a white box with a green border. The title 'CERTIFICATION CLAIMS DURING THE CONVERSION PROCESS' is prominent. There are sections for 'General (Land) Requirement' and 'Explanation of Land and Organic Claims'. A diagram shows the timeline for organic claims. The footer contains the NASAA contact information.

Input Directory

Operators are reminded that input products can be located via the NASAA Certified Input Search facility available on the NCO website below:

NCO Input Search

Alternatively, a full list of NCO Certified Inputs can be downloaded as a PDF from the website or from below:

NCO Input Directory

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

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