

	NASAA Certified Organic Additional Requirements for EU Exporters (International)	Version 1.6
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ADDITIONAL REQUIREMENTS FOR CERTIFICATION FOR EXPORT TO THE EU (INTERNATIONAL)

Scope: These Additional Requirements are applicable for all NASAA Certified International applicants and operators that have applied for or are certified in the NASAA International EU Program. Product may only be exported to the EU if it was certified under this program with a NASAA EU Certificate.

1.1) INTRODUCTION

The European Union regulates organic food production and marketing applicable to imports. To be eligible for a *Certificate of Inspection For Import of Products From Organic Production* into the EU under NCO's EU Exporter (International) Program, specific additional requirements of the EU regulations that are not covered by the NASAA Organic Standard must be documented, implemented, inspected and approved by NCO.

1.2) Certification label: NASAA IFOAM label.

1.3) Standards: NASAA Organic Standard IFOAM Program plus Additional EU Requirements.

1.4) Certificate: NASAA Organic Standard Equivalent to Council Regulation EC 834/2007.

1.5) Categories: crop, livestock, grower groups, wild harvest, livestock feed, processing, handling, export. Excluded – aquaculture.

2) ADDITIONAL REQUIREMENTS

2.1) Livestock Feed

2.1.1) Livestock feedstuff to be sold as organic must meet the EU Regulations and be certified. The basis is the NASAA Organic Standards for plant and animal production and the processing & handling standards.

2.1.2) Transport of feedstuffs must comply with all requirements for transport of food.

2.1.3) Records of all feeds administered must be kept.

2.1.4) Feeding meat meal is prohibited to all species.

2.1.5) Force feeding of all species is forbidden.

2.1.6) Herbivore production must be based on maximum use of grazing pasture according to availability of pastures in the different periods of the year. At least 60% dry matter in daily rations shall consist of roughage, fresh or dried fodder or silage.

2.2) Livestock Parallel production

2.2.1) Parallel production of the same species of animal is prohibited.

2.2.2) Non organic livestock from extensive husbandry may graze certified pasture for a limited time only after receiving NCO authorisation (derogation). Certified animals may not be present at the same time; segregation must be clear & documented.

2.2.3) Non organic livestock of separate species (eg sheep) *on separate units* (buildings & land parcels) may be permitted with certified species (eg cattle). Documentary evidence of separation must be kept.

Such non organic units must be subject to inspection including storage premises for inputs.

2.2.4) Conversion livestock must be kept separate or readily separable (method documented) and records kept to show separation.

2.3 Livestock Production

2.3.1) Poultry producers must either use slow growing strains or adhere to the following minimum slaughter ages: Chickens 81 days; capons 150 days; Peking ducks 49 days; female Muscovy ducks 70 days; male Muscovy ducks 84 days; Mallard ducks 92 days; guinea fowl 94 days; male turkeys & roasting geese 140 days; female turkeys 100 days.

2.3.2) Transhumance: Livestock may be transported by foot and may graze uncertified land whilst being moved from one grazing area to another if unavoidable. During this period, the uptake of non organic feed in the form of grass and other vegetation shall not exceed 10% of the total feed ration per year. This shall be calculated as a percentage of the dry matter of feedstuffs from agricultural origin. Operators shall keep documentary evidence of any transhumance activity including the route, feed intake and separation from other livestock.

(Note: Transhumance on non-certified areas is not permitted where operators have US NOP certification.)

2.3.3) Split Livestock Production: in operations under organic production and partly in conversion the operator shall keep organically produced and in-conversion livestock and livestock products separate and keep adequate records to show identification and separation.

2.4 Beekeeping

2.4.1) Artificial feeding may be carried out only between the last honey harvest and 15 days before the start of the next nectar or honeydew flow period.

2.4.2) Detail on removal of supers and honey extraction operations must be entered in the register of the apiary.

2.4.2) The use of combs which contain broods is prohibited for honey extraction.

2.5) Crops & Pasture

2.5.1) Non organic seed is prohibited for grain production (organic seed must be used).

For the production of products other than seed & vegetative propagating material, only organically produced seed & propagating material shall be used. To this end, the mother plant in the case of seeds, and the parent material in the case of vegetative propagating material, shall have been produced under certification for at least one generation, or for perennial crops for 2 generations.

Only where organic seed & propagative material is not available in organic form (a Derogation must be applied for and approved prior to use) non-organic seed & seed potatoes may be used provided they are not treated with plant protection products.

2.5.2) Conversion plant products: The conversion label applied to crop products may only be used where the product contains only one crop ingredient of agricultural origin.

2.5.3) Split Production: in operations under organic production and partly in conversion the operator shall keep organically produced and in-conversion products separate and keep adequate records to show separation.

2.5.4) Parallel production of the same species of annual crops or seed and propagation material is prohibited.

2.5.5) Parallel production of perennial crops is only permitted in the conversion plan; separation measures must be clear and documented. Additional inspection at harvest will be required. Operators must notify NCO at least 48 hours in advance of harvest; and after harvest, of the quantity harvested immediately on completion along with separation measures adopted.

2.5.6 Fertilisers & Soil Conditioners:

a) The following requirements are above those stated in the NASAA Organic Standard for the listed inputs

Name	Description	Restriction
Animal manures (fresh and dried) & liquid excrements	Animal manure and excrement must be composted Liquid excrements must be diluted or control fermented	Manure & excrements from factory farming prohibited
Animal by-products	Blood, bone, hoof, horn, fish, meat, feather/hair meals; wool; fur; hair; dairy products	Maximum chromium (VI) concentration: 0 mg/kg of dry matter
Composted or fermented household waste		Maximum heavy metal residues concentration not to exceed cadmium 0.7; copper 70; nickel 25; lead 45; zinc 200; mercury 0.4; chromium (total) 70; chromium (VI) 0 mg/kg of dry matter

b): Operators must keep documented evidence of the need to use input products for nutritional needs of plants.

c) Surplus manure from certified operation may be able to be used on another certified operations, provided there is an agreement in place to cover:

1. the protection of waters against pollution caused by nitrates from agricultural sources
 2. applied on the holding may not exceed 170 kg of nitrogen per year/hectare of agricultural area used
- Also note, as per the NASAA Organic Standard All animal manure slurry or shed manures should be composted in preference to direct application.

2.5.7 Permitted for plant pest and disease control

a) The following requirements are additional to those stated in the NASAA Organic Standard for permitted inputs

Name	Description, compositional requirement, conditions for use
Basic substances	Only those basic substances within the meaning of Article 23(1) of Regulation (EC) No 1107/2009 that are covered by the definition of "foodstuff" in Article 2 of Regulation (EC) No 178/2002 and have plant or animal origin. Substances not to be used as herbicides, but only for the control of pests and diseases.
Beeswax	Only as pruning agent/wound protectant
Hydrolysed proteins excluding gelatine	
Laminarin	Kelp shall be either grown organically or harvested in a sustainable way
Plant oils from citronella, clove, spearmint and rapeseed	All uses authorised, except herbicide
Pyrethroids (only deltamethrin or lambda-cyhalothrin)	Only in traps with specific attractants; only against <i>Bactrocera oleae</i> and <i>Ceratitis capitata</i> Wied.
Quassia extracted from <i>Quassia amara</i>	Only as insecticide, repellent
Repellents by smell of animal or plant origin/ sheep fat	Only on non-edible parts of the crop and where crop material is not ingested by sheep or goats.
Micro-organisms	Only if permitted under Regulation (EU) No 540/2011 Not from GMO origin.
Spinosad	
Calcium hydroxide	When used as fungicide, only in fruit trees, including nurseries, to control <i>Nectria galligena</i> .
Carbon dioxide	
Copper compounds in the form of: copper hydroxide, copper oxychloride, copper oxide, Bordeaux mixture, and tribasic copper sulphate	Up to 6 kg copper per ha per year. For perennial crops, by way of derogation from the first paragraph, the 6 kg copper limit can be exceeded in a given year provided that the average quantity actually used over a 5-year period consisting of that year and of the 4 preceding years does not exceed 6 kg.
Ethylene Fatty acids	All uses authorised, except herbicide
Ferric phosphate (iron (III) orthophosphate)	Preparations to be surface-spread between cultivated plants
Paraffin Oil	Only those forms listed under Regulation (EU) No 540/2011

2.6) Plant and Livestock Products

2.6.1) Exporters must be certified.

2.6.2) Transport of organic products: must be in appropriate packaging, containers or vehicles closed in such a manner that substitution of the contents cannot be done without manipulation or damage to the seal. Must be labelled with name & address of operator or owner of the product; product name (and description if a compound feedstuff); NCO Name in full or NCO code number (as printed on the operator's certificate); organic status; lot/batch ID. This may be presented on an accompanying document if it can undeniably be linked with the product. This document must also state the supplier &/or transporter.

2.6.3) Supplier status must be verifiable with documentary evidence and must be EU compliant.

2.7) Excluded Practices

2.7.1) Ethylene gas is not permitted for ripening.

2.7.2) Prohibited materials (materials not authorized under the NASAA Organic Standard or these Additional Requirements) cannot be stored anywhere on the certified land or facilities.

2.8) Processed Products

All of 2.6 applies to processed product.

2.8.1) In-Conversion products. Food produced from in-conversion crops shall contain only one crop ingredient of agricultural origin. (See 2.5.2 above)

2.8.2) The following Food Additives are additional to, or have additional conditions to the NASAA Organic Standard

Code	Name	Preparation Foodstuff		Specific Conditions
		Plant origin	Animal origin	
E 306	Tocopherol-rich extract	X	X	Anti-oxidant
E 322	Lecithins	X	X	Milk products. Only when derived from organic raw material
E 418	Gellan gum	X	X	High-acyl form only
E 422	Glycerol	X		From plant origin. For plant extracts and flavourings
E 551	Silicon dioxide gel or colloidal solution	X	X	For herbs and spices in dried powdered form Flavourings and propolis
E 901	Beeswax	X		As a glazing agent for confectionary only. Beeswax from organic beekeeping
E 903	Carnauba wax	X		As a glazing agent for confectionary only. Only when derived from organic raw material
E 968	Erythritol	X	X	Only when derived from organic production without using ion exchange technology

2.8.3) The following Processing Aids are additional to, or have additional conditions to the NASAA Organic Standard

Name	Preparation Foodstuff		Specific Conditions
	Plant origin	Animal origin	
Vegetable oils	X	X	Greasing, releasing or anti-foaming agent. Only when derived from organic production
kaolin			Not permitted
Acetic acid/vinegar		X	Only when derived from organic production. For fish processing, only from biotechnological source, except if produced by or from GMO
Wood fibre	X	X	The source of timber should be restricted to certified, sustainably harvested wood. Wood used must not contain toxic components (post-harvest treatment, naturally occurring toxins or toxins from micro-organisms)
Potato starch	X	X	For filtering Only when derived from organic production

2.9 Mushrooms:

- If inputs that are listed in 2.5.6a) are used for substrates for mushroom production the restrictions in that table must be observed.
- Manures and animal excrements in mushroom substrates must be from organic production systems.
- If organic manures and animal excrements are not available, a maximum of 25% weight of total components excluding water and covering material may be derived from other sources of vermicompost, composted vegetable matter and other plant products, sawdust, composted bark which have not been chemically treated.

3.0 Wild Collection of plants:

Collection of wild plant products from growing naturally in natural areas, forests, and agricultural area may be considered organic provided:

- No prohibited substances or inputs are used for a period of at least three years
- the collection does not affect the stability of the natural habitat or the maintenance of the species in the collection area.

Operators must get a statutory declaration or affidavit (from third parties if applicable) to demonstrate the above requirements are complied with.

3.1 Operator's own Quality Assurance program:

Operator may be requested to submit the results of the Quality Assurance Program.

3.2 Seed, Vegetative Propagation, and Transplant: Parallel Production

Operator may run organic and non-organic production units in the same area, provided:

- A. There is a system in place to ensure permanent separation of the products obtained from each unit
- B. Operators must notify NCO at least 48 hours in advance of harvest
- C. Operators must notify NCO quantity harvested immediately on completion
- D. Annual approval by NCO for the conversion plan.

3.3 Grassland exclusively used for grazing

Operator may run organic and non-organic production units in the same area in the case of grassland exclusively used for grazing.

3.4 Organic Yeast Production:

- A. For the production of organic yeast only organically produced substrates shall be used.
- B. Other products and substances may only be used in so far as they have been authorized by NCO for use in organic production
- C. Organic yeast shall not be present in organic food or feed together with non-organic yeast.
- D. The substances allowed in the EU regulations may be used in the production, confection and formulation of yeast with prior approval from NCO.

Processing aids for production of processed organic food, yeast and yeast products

Name	Primary yeast	Yeast confections/ formulation	Specific conditions
Calcium chloride	X		
Carbon dioxide	X	X	
Citric acid	X		For the regulation of the pH in yeast production
Lactic acid	X		For the regulation of the pH in yeast production
Nitrogen	X	X	
Oxygen	X	X	
Potato starch	X	X	For filtering
Sodium carbonate	X	X	For the regulation of the pH
Vegetable oils	X	X	Greasing, releasing or anti-foaming agent

3.5 Use of Inputs

The authorisation of the products and substances by NCO is subject to the following objectives and principles the following general and specific criteria which shall be evaluated as a whole:

- (a) their use is necessary for sustained production and essential for its intended use;
- (b) all products and substances shall be of plant, animal, microbial or mineral origin except where products or substances from such sources are not available in sufficient quantities or qualities or if alternatives are not available;
- (c) in the case of plant protection products the following shall apply:
 - (i) their use is essential for the control of a harmful organism or a particular disease for which other biological, physical or breeding alternatives or cultivation practices or other effective management practices are not available;

(ii) if products are not of plant, animal, microbial or mineral origin and are not identical to their natural form, they may be authorised only if their conditions for use preclude any direct contact with the edible parts of the crop;

(d) in the case of Fertilisers and Soil Conditioners their use is essential for obtaining or maintaining the fertility of the soil or to fulfil specific nutrition requirements of crops, or specific soil-conditioning purposes;

(e) in the case of non-organic feed materials from plant origin, feed material from animal and mineral origin and certain substances used in animal nutrition; feed additives and processing aids;, the following shall apply:

(i) they are necessary to maintain animal health, animal welfare and vitality and contribute to an appropriate diet fulfilling the physiological and behavioural needs of the species concerned or it would be impossible to produce or preserve such feed without having recourse to such substances; feed of mineral origin, trace elements, vitamins or provitamins shall be of natural origin. In case these substances are unavailable, chemically well-defined analogic substances may be authorised for use in organic production; diet fulfilling the physiological and behavioural needs of the species concerned or it would be impossible to produce or preserve such feed without having recourse to such substances;

(ii) feed of mineral origin, trace elements, vitamins or provitamins shall be of natural origin. In case these substances are unavailable, chemically well defined analogic substances may be authorised for use in organic production.

3.6 Calculation for processed product ingredients

Yeast shall be included in the percentage calculations of organic ingredients

3.7 Use of Mineral Oil for pest and disease control

Use of Mineral Oils for pest and disease control is prohibited