



NASAA Organic Trader Standard



NASAA ORGANIC TRADER STANDARD

August 2005

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1.0 DEFINITIONS

Appeal: request by an operator for reconsideration of any decision made by NASAA in relation to their certification. Appeals must be submitted to NASAA in writing within 30 days of a determination being made by NASAA.

Biodegradable: subject to biological decomposition into simpler biochemical or chemical components.

Biodynamic: (BD) production system based upon principles and preparations established by Rudolf Steiner.

Certified: to have been inspected and licensed by NASAA in accordance with this Standard.

Certification: means the acceptance by NASAA of an operator's conformity to this Standard as verified through inspection and audit by NASAA.

Conventional: farming that relies on synthetic inputs and is not operated organically (ie. any system not compliant with the principles outlined in this Standard).

Decertification: the total withdrawal of certification by NASAA.

Detectable Residue: the amount or presence of chemical residue or sample component that can be reliably observed or found in the sample matrix by current approved analytical methodology.

Exception: permission granted to an operator from NASAA to be excluded from the need to comply with normal requirements of this Standard. Exceptions are granted on the basis of clear criteria, with clear justification and for a limited time period only.

Export Certificate: mandatory documents issued by NASAA to confirm that export goods claiming to be organic are certified by an AQIS accredited certification organisation.

Food Additive: an enrichment, supplement or other substance which can be added to a foodstuff to affect its keeping quality, consistency, colour, taste, smell or other technical property.

Food Ingredient: substances, including additives used in the preparation of products for human consumption that are still present, albeit in a modified form, in the final product.

Genetic Engineering: genetic engineering is a set of techniques from molecular biology (such as recombinant DNA) by which the genetic material of plants, animals, micro-organisms, cells and other biological units are altered in ways or with results that could not be obtained by methods of natural mating and reproduction or natural recombination. Techniques of genetic modification include, but are not limited to: recombinant DNA, cell fusion, micro and macro injection, encapsulation, gene deletion and doubling. Genetically engineered organisms do not include organisms resulting from techniques such as conjugation, transduction and natural hybridisation.

HACCP: stands for Hazard Analysis Critical Control Points and refers to the systematic process of analysis of potential hazards and actions for remedy in the production system.

Handling, Processing and Preparation: includes the operations of manufacturing, preserving, milling, slaughtering, storing, packing and handling of agricultural products of organic origin and also alterations made to the labelling concerning the presentation of the organic production method.

Ingredient: any substance used in the preparation of an agricultural product that is still present in the final commercial product as consumed.

Inspection: a process used by NASAA to verify compliance with this Standard.

Inspection Review Committee (IRC): NASAA's committee, which evaluates inspection reports and makes certification determinations and recommendations to NASAA.

Inspector: any person deemed appropriately qualified who is contracted or used by NASAA to conduct inspections for certification purposes.

In Conversion: a production system which has adhered to this Standard for a minimum of one year and which has been certified as such but which does not yet fully qualify as organic or biodynamic.

Ionising Radiation: radiation of the type produced by gamma rays from radionuclides such as cobalt-60 or caesium -137, electrons generated from machine sources, or X-rays generated from machine sources, prohibited in organic systems.

Labelling: any words, particulars, trademarks, brand names, names of certifying organisations, pictorial matter or symbols appearing on any packaging, document, notice, label board or collar accompanying or referring to a product specified in this Standard.

Licensee: the person legally responsible for maintaining compliance to this Standard.

Maximum Permissible Concentration (MPC): maximum concentrations of given substances (heavy metals) allowed in foods as defined by Standard 1.4.2 under Food Standards Australia and New Zealand (FSANZ).

Maximum Limit (ML): maximum residues of given substances, such as agrichemicals allowed on foods as set by Food Standards Australia and New Zealand (FSANZ) under Standard 1.4.1. Previously referred to as Maximum Residue Limits (MRL). Where there is no specified limit for a particular chemical substance for a specified product there is zero tolerance for the particular chemical.

Non Agricultural Product: a substance that is not a product of agriculture, such as a mineral or a bacterial culture, salt and water that is used as an ingredient in an agricultural product.

Operator: the individual responsible for the conduct of the operation who may or may not be the person licensed to use the NASAA Label.

Organic: a labelling term that refers to an agricultural product produced in accordance with the NASAA Standard.

Organic Quality Management System: means the system deployed by an operator that documents and demonstrates that operator's capacity to comply with this Standard.

Parallel Production: producing the same product organically and conventionally by the same operator or producing Organic and In Conversion product on the same property or by the same operator.

Principal Display Panel: means the panel on packaging which identifies the primary or advertised description of the product.

Potable Water: as defined by the National Health and Medical Research Council under the Australian drinking water guidelines (ie suitable for drinking).

Pre-certification: the period of time (12 months minimum) that must elapse prior to attaining certification at the Conversion level. The period commences upon receipt of payment, application form and completed "Applicant Organic Management Plan Questionnaire".

Processing Aid: substances intentionally added to food for use in the processing of raw materials, food or food ingredients in order to fulfil an essential technological purpose during treatment or processing. Their use may result in their unavoidable presence in the final product.

Production or Processing Unit: an enterprise, or portion thereof, that produces a product or food under specific organic management practices as inspected by NASAA.

Prohibited: substances that are not permitted under this Standard. The NASAA Standard is "positive" therefore unless a substance is listed as being permitted, it is not permitted.

Residue Testing: an official or validated analytical procedure that detects, identifies, and measures the presence of chemical substances, their metabolites, or degradation products in or on raw or processed agricultural products.

Sanctions: measures taken against certified operators who have failed to comply with this Standard or other requirements of the certification body.

Suspension: a defined period, ordinarily no greater than two weeks, during which an operator must provide NASAA with verification of compliance with this Standard following non-compliance with any section of this Standard. During this period an operator must not sell produce with reference to NASAA certification.

Synthetic: produced by artificial processes and not the ordinary processes of nature.

2.0 FOREWORD:

The National Association for Sustainable Agriculture Australia, Limited (NASAA) took over the administration and operation of the retail certification scheme Organic Retailers and Growers Association Australia (ORGAA) in July 2002. During this period NASAA has witnessed steady and strong growth in the organic industry with annual growth in excess of 20-25%¹.

This latest edition of the NASAA Organic Trader Standard will provide the benchmark for retail certification, encompassing retailers, restaurants, home delivery, food preparation and market operations. This Standard should be read in conjunction with the current edition of NASAA Organic Standard which outlines the requirements for certification from farm production through to on farm and off farm processing, transportation, export and import.

This Standard is an important tool in providing consumers with a guarantee of integrity for products claiming to be organic, thereby facilitating consumer confidence in business practices.

This Standard comprises three sections. They outline the:

- **GENERAL PRINCIPLES** behind the architecture of organic food production and handling and include a range of
- **RECOMMENDATIONS** which should be put into place where appropriate (best practice)

These two sections are clearly identified but unlike the numbered standards, are not subject to inspection and compliance. The recommendations could, if deemed appropriate, become standards in future revisions.

- **STANDARDS** are the minimum requirements which must be met under NASAA's organic retail certification program, which is accredited by AQIS.

Requirements, recommendations and practices referred to in this Standard do not take precedence over and must not lead to the contravention of state, national or international law. It is the responsibility of the operator to acquaint themselves with the relevant laws and regulations, in particular Food Standards Legislation (FSANZ), Trade Practices Act and Fair Trading Legislation.

The NASAA Organic Trader Standard is a living and dynamic document. Our Standards Committee Chaired by Rod May and coordinated by Kate Hamer, welcomes comment regarding amendments, new additions and clarifications.

Amendments to this Standard are effective immediately for new applicants to the NASAA Certification Program. For existing licensees, amendments become effective six (6) months from the date of publication. All licensees will be notified in writing by either an amendment sheet describing the changes to the existing Standard, or by the receipt of a copy of the reprinted Standard in the case of major revision.

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¹ RIRDC 2000
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3.0 INTRODUCTION – WHY HAVE STANDARDS?

Retail certification, which includes shops, markets, home delivery, food preparation and restaurants, is the interface between the organic industry and consumers. Retail certification is the final step in a certification system developed to provide the consumer with a guarantee of organic integrity through an accredited and independent verification system.

Certified retail outlets provide consumers with a guarantee of truth in labelling and associated claims through adherence to this Standard.

The fundamental principles associated with this Trader Standard are:

- To ensure that the consumer purchases genuine organic products (giving protection against fraudulent practices).
- To ensure that the credibility of the trader can be authenticated, thereby enhancing public confidence.
- To protect the genuine organic farmer(s) from producers who might claim their goods to be organic.
- To ensure that the good names of accredited certifiers are not destroyed by unscrupulous operators, cashing in on the surge of interest in organic.
- To define certified organic and biodynamic produce in the domestic market in the absence of government legislation.

Note:

It is expected that all traders will be familiar with the Commonwealth, State and Territory laws and regulations relevant to their industry and these will take precedence over anything in this Standard.

This Standard should be read in conjunction with the NASAA Organic Standard (December 2004).

4.0 SCOPE

Retailers, restaurateurs, home delivery, food preparation, retail based self-repackers and handlers using from 15% to 100% certified organic products and markets.

5.0 OBJECTIVE

NASAA has implemented an incentive based system into certification for retail and restaurant outlets, to ensure that over time there is a demonstrated commitment to the handling of certified organic product. The objective is that within three years from the date of application for certification, all certified retail and restaurant facilities will handle a majority of certified product (ie greater than 50%). Once retail and restaurant facilities can demonstrate through inspection that they handle a majority of certified product, they may make general claims to “organic certification”.

6.0 CERTIFICATION REQUIREMENTS

6.1 PRODUCT LABEL

MINIMUM 15% CERTIFIED PRODUCT:

Retail outlets must demonstrate that a minimum of 15% of product is certified (in conversion, organic, conversion to biodynamic or biodynamic) upon application for certification. Restaurant facilities must demonstrate that 15% of dishes available on the menu are certified (in conversion, organic, conversion to biodynamic or biodynamic) upon application to certification.

Provided this minimum requirement can be demonstrated through inspection the use of the NASAA label is permitted for product only.

Label usage is restricted to product (as per example below)²:



MAJORITY CERTIFIED PRODUCT (GREATER THAN 50%):

Retail outlets must demonstrate that a majority (greater than 50%) of product is certified (conversion, organic, conversion to biodynamic or biodynamic) within 3 years under certification. Restaurant facilities must demonstrate that a majority of dishes (greater than 50%) available on the menu are certified (in conversion, organic, conversion to biodynamic or biodynamic) within 3 years of certification.

Upon demonstrated compliance to this requirement through inspection the use of the NASAA label is permitted for product and promotional purposes.

6.2 PROMOTIONAL LABEL

Retail and restaurant outlets that handle a majority (greater than 50%) certified organic product can make broader claims to certification and utilise the NASAA Certified Trader label on promotional material (ie shop frontage).



PROMOTIONAL LABEL

or



PROMOTIONAL LABEL

7.0 LABELLING REQUIREMENTS

PRINCIPLE

Labelling of product, certified or otherwise, is clear, consistent and unambiguous. A systematic (standardised) labelling scheme is adopted that clearly identifies the certification status of all product sold within the premise.

RECOMMENDATION

It is recommended that certified premises utilise a negative labelling system to identify non-organic product.

Certified operators should be referred to on labelling where appropriate.

STANDARDS:

PRODUCT LABELLING:

7.1 Certified product that is labelled "in house" (including display labelling) must be clearly identified by the following information:

- Certification level (bio-dynamic, organic, conversion to biodynamic or conversion)
- Certification number (retail certification number) and certification logo



² Note that the product label utilised will reflect the certification level of ingredients and or product
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- 7.2 A consistent colour scheme shall be adopted, and approved by NASAA, to differentiate between certified (conversion, organic, conversion to biodynamic and biodynamic) and conventional product.
- 7.3 No reference can be made to terms such as “minimum spray”, “chemical free” or other terms which imply purity and chemical free status, unless these are backed up with certification from a recognised body.
- 7.4 Labelling shall be submitted to NASAA and approved in writing prior to utilisation.
- 7.5 Packaged, labelled product supplied to retail outlets shall be certified by an Accredited certification body (ie Government such as AQIS, EU 2092/91, JAS, NOP or IFOAM) where reference is made to certification (bio-dynamic, organic, conversion to biodynamic or conversion) on product packaging.
- 7.6 Organic multi-ingredient and processed (prepared) products shall comprise at least 95% or more of the raw or unprepared product as certified. The 5% non-organic component shall only be comprised of processing aids and additives as listed in the NASAA Organic Standard December 2004 (“Annex 4 – Acceptable Additives of Non Agricultural Origin and Processing Aids”).
- 7.7 Multi-ingredient and processed products that comprise 70 – 95% or more of raw or unprepared product that is certified organic cannot be labelled as organic. The product and/or dish can be labelled as “made from organic products” provided individual ingredients that are certified organic are clearly indicated. The type face (font, size and colour) to denote organic ingredients shall be identical to the type face to denote non organic ingredients.
- 7.8 Multi ingredient and processed product that does not comprise a minimum 70% certified organic ingredients cannot make any reference to organic.
- 7.9 Restaurants shall have a daily (seasonal) display board denoting which dishes are certified organic.

PROMOTIONAL LABELLING:

- 7.10 The NASAA Certified Trader label is permitted for use on shop frontage and other promotional material where greater than 50% of product is certified.



or



8.0 RECORDS and DOCUMENTATION

PRINCIPLE

Records and associated documentation are essential tools to enable analysis and review of a certified trading operation. They also provide the foundation for independent verification and are an important mechanism for ensuring product integrity through providing a documented audit trail.

STANDARDS

- 8.1 Records shall be made available for inspection and assessment and must be maintained for a minimum of five years.
- 8.2 Purchase records (invoices, delivery documents) for all certified product shall include
- Itemised product certification details (including number & certifying body)
 - Name of supplier including supplier certification details

- Certification level
 - Date of purchase
 - Quantity purchased
- 8.3 Sales records (invoices, consignment notes, cash register docket) shall be maintained for all certified product.
- 8.4 Records such as bar coding, batch numbering and dating systems shall show a clear audit trail for organic product from its entry into the handling or packaging system as raw material to its ultimate release to the consumer as packaged products.
- 8.5 Records shall be maintained for storage, cleaning, pest control, packaging, product recall, staff training, and wastage.
- 8.6 A copy of the current organic certificate of registration for the suppliers of all goods to be repacked shall be maintained.
- 8.7 The operator or handler shall have a system of product re-call with clearly designated procedures and protocols to ensure that recall of a NASAA labelled product can be quickly and effectively carried out.

9.0 STORAGE and HANDLING

PRINCIPLE

The storage and handling of certified (bio-dynamic, organic and conversion) product is carried out separately to the storage and handling of conventional product to ensure product integrity at all times.

STANDARDS

- 9.1 The storage and handling (including packaging) of loose certified product shall be carried out separately in time and/or place from storage and handling of conventional product.
- 9.2 Storage and handling shall be carried out in ways that avoid contamination of organic food with:
- Cleansers and sanitisers
 - Residues from previous products
 - Facility pesticide applications
 - Prohibited processing aids or additives
 - Packaging products or other products used in the area designated for packaging
 - Pest and pathogens and their residues
- 9.3 Display areas shall clearly identify, through segregation, certified and non-certified product.
- 9.4 Storage, handling and display areas must clearly identify certified (conversion, organic, conversion to biodynamic or biodynamic) product.
- 9.5 The following storage conditions are approved:
- Modified atmosphere (ie. Nitrogen, Oxygen, Carbon Dioxide)
 - Cooling
 - Freezing
 - Drying

- Humidity manipulation

10.0 PACKAGING

PRINCIPLE

Non-essential packaging is avoided where possible and recycling, reusing and reducing are practiced when statutory regulations permit.

RECOMMENDATION

A full environmental audit for packaging is recommended which should assess the following:

- Returnable outers and bulk containers
- A deposit scheme for cans and bottles
- The use of recycled outer packaging and indicated as such
- Single layer, single substance, recyclable packaging
- Bulk packaging materials available at retail outlets for self-selection
- The use of unbleached paper and cardboard

STANDARDS

- 10.1 Non-essential packaging is not permitted.
- 10.2 Packaging materials shall not be capable of transmitting contaminants to organic produce.
- 10.3 All materials used must be food-grade, clean, as new, and of suitable design to protect the organic integrity of the food product during transport, storage and display.
- 10.4 Expanded polystyrene using Chloro Fluoro Carbons (CFC), Polyvinyl Chloride (PVC) and lead are prohibited in packaging.

11.0 SANITATION & CLEANING (including pest control)

PRINCIPLE

Sanitation and cleaning practices are carried out in a manner that does not result in the contamination of certified product. Cleaning products are chosen based on consideration for worker safety, avoidance of residual contamination, rapid biodegradability and low toxicity.

STANDARDS

- 11.1 Cleaning and sanitation shall not be carried out in the presence of unsealed certified product.
- 11.2 Cleaning and sanitation products shall be stored separately from all food product and clearly identified.
- 11.3 The following products are permitted for sanitation of food preparation and storage surfaces. Their use shall be followed by a water flush:
 - Acetic acid (vinegar)
 - Alcohol, ethyl
 - Alkali carbonates
 - Bleach (not to exceed 4ppm solution)
 - Bicarbonate soda (sodium bicarbonate)
 - Caustic potash and caustic soda

- Hydrogen peroxide
- Iodine (non-elemental, not to exceed 5% solution eg. iodophors)
- Lime
- Natural acids (eg. vinegar, lactic, phosphoric)
- Potassium permanganate (not to exceed 1% solution)
- Soaps
- Sodium hydroxide
- Sodium borate

11.4 The use of chemical substances, including bait stations, to control pests is not permitted in certified retail outlets where unsealed product is contained. Refer to section 9.7 NASAA Organic Standard (December 2004).

12.0 STAFF TRAINING

PRINCIPLE

All staff are knowledgeable in basic organic production and processing methods and understand the importance of certification of organic product to facilitate responses to customer questions about certified organic product.

STANDARDS

12.1 Staff training shall include the following areas:

- Organic production and processing (as per the NASAA Organic Standard December 2004).
- Safe handling practices for organic and non-organic produce.
- Basic knowledge of organic and bio-dynamic certification procedures.

13.0 MARKET CERTIFICATION

PRINCIPLE

NASAA Market Certification is the certification of a market outlet with a minimum number of certified operators present. It requires the market authority to ensure that there is no false or misleading claims of organic made at that market. It does not extend certification to individual stallholders.

STANDARDS

13.1 That a minimum of 20% (and not less than one stall holder) of individual stall holders who handle product that falls within the scope of the NASAA Standard must be certified by a retail certification scheme such as NASAA from the time of application for Market Certification.

13.2 That if the proviso in point one above is not met on any specific market day certification is forfeited until rectified.

13.3 Where certified farmers produce and sell product direct to the consumer at the Market, they must maintain their certificate of registration at the stall specifying product included under their scope of certification. Farmers may not display their certification at the front of the stall unless the entire contents of that stall are grown by the farmer under their respective certification.

- 13.4 Packaged products ready for the consumer can only be referenced as “organic” if the packaging indicates organic certification (certification logo and/or certification number).
- 13.5 That any on site food or drink preparation must be certified if the finished product is claimed to be organic.
- 13.6 That only certified organic products can be labelled as “organic”. Certified “In Conversion” products must be labelled as “Certified In Conversion”. No other claims to organic can be made.
- 13.7 Products cannot be labelled as “organic”, “minimum spray”, “chemical free” or make claims that imply purity and chemical free status unless these are backed up with certification from a recognised body.
- 13.8 That each stall holder selling organic products must sign a contract (Standard terms and Conditions) with the Market Management prior to trading at the market. This contract must include a declaration on the following (in addition to general terms):
- That the term “organic” and/or “in conversion to organic” can only be used on products that have been certified.
 - Furthermore, they agree to maintain documentation to verify the certification status of each product labelled with reference to “organic” or “in conversion to organic” to enable the consumer (and NASAA) verification of the status of products so labelled. In the case of farmers markets, this will be the respective certificate of registration for my farming/processing operation. In the case of General Markets, this will be provided through certificates for each product claiming to be certified. I understand that unless products are certified as per the above, no reference to “organic” or “in conversion” to organic can be made.
 - That no use of the NASAA label on loose or prepared food is to be made unless the individual stallholders obtain NASAA certification.
- 13.9 That the Market Management agrees to conduct regular and random inspections of all non certified retail stallholders making reference to organic and/or conversion.
- 13.10 That the Market Management agrees that NASAA will conduct random inspections of each market to check that the market rules are being complied with.
- 13.11 That the Market Management must identify each stall with reference to one of the following signage (no smaller than A3 in size) to be displayed at all entrances to the stall in a prominent position and in such a way as it is visible and readable to all entering the stall:
- “Certified Organic” stall where specific certification, such as NASAA, is held
 - “Non Certified Organic Stall handling certified organic product”
- 13.12 Any advertising (press, radio, internet) of the market may incorporate the slogan “Certified by NASAA, Australia’s Leading Organic Retail Certification.”



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