



Welcome to the OCAA Newsletter #2

"Protecting organic
consumers and
encouraging organic
conversion."

NEWSLETTER

May 2021



© 2021 OCAA



WELCOME!

Organic Consumers Association of Australia (OCAA) extends a warm welcome to all our new members and friends. Here is our second newsletter with updates and news articles on current issues in Australian organics.

The Organic Consumers Association of Australia (OCAA) is the first and only non-profit organisation in Australia that is dedicated to protecting and advancing the interests of consumers of organic food and other products.

OCAA is a non-profit, grass roots group that wants to enhance ethical and quality standards in the Australian certified organic food industry.

OCAA is actively engaged in organic standards and certification issues, promoting organic food to consumers, and encouraging conversion of Australian farms to organic growing, for the benefit of consumers and the environment.

We thank you for your interest in, and support for our mission of advocating for maintaining and enhancing organic industry standards that make “certified organic” a safe source of healthy food, and our ongoing efforts to raise awareness and promote sustainable agriculture.

OCAA

Page

05

Welcome to our New Chair

Tim Marshall retires and the
OCAA welcomes secretary
Simon Jones into the Chair.

Page

06

What is a "Participatory Guarantee System"?

page 3

Edition 2

CONTENTS

Page

07

"FOOD NEXT DOOR"

- matching under-
utilised farmland
with landless
farmers.

Page

08

Two Standards?

Organic Consumers
Association of
Australia position on
the AS6000.

Page

10

OISCC LOSES CONFIDENCE OF OCAA

Transparency,
politicisation &
governance concerns

Page

15

Book Review

SUSTAINABLE
AGRICULTURE VERSUS
CORPORATE GREED:
Small Farmers, Food
Security & Big Business by
Alan Broughton & Elena
Garcia



REACHING OUT



Find OCAA on Facebook & LinkedIn

We all get how Social Media has had a huge impact on how we live our lives and, for a special interest group like the OCAA, social media channels are a valuable and convenient forum for keeping in touch with our members and friends, and sharing daily updates, news items and articles that are 'on topic' for people who care about healthy food and sustainable agriculture.

So, if you belong to Facebook or LinkedIn, follow us to stay in touch!
(Links to our social media feeds are on the back page of this newsletter.)

The OCAA Website

The Organic Consumers Association of Australia maintains a central website where people who care about maintaining trust in certified organic food standards, and who would like to see the Organics industry focus on consumer needs and values, can join our group to stay in touch with issues and campaigns to keep the industry ethical and transparent. You'll find us at www.organic-consumers.com.au

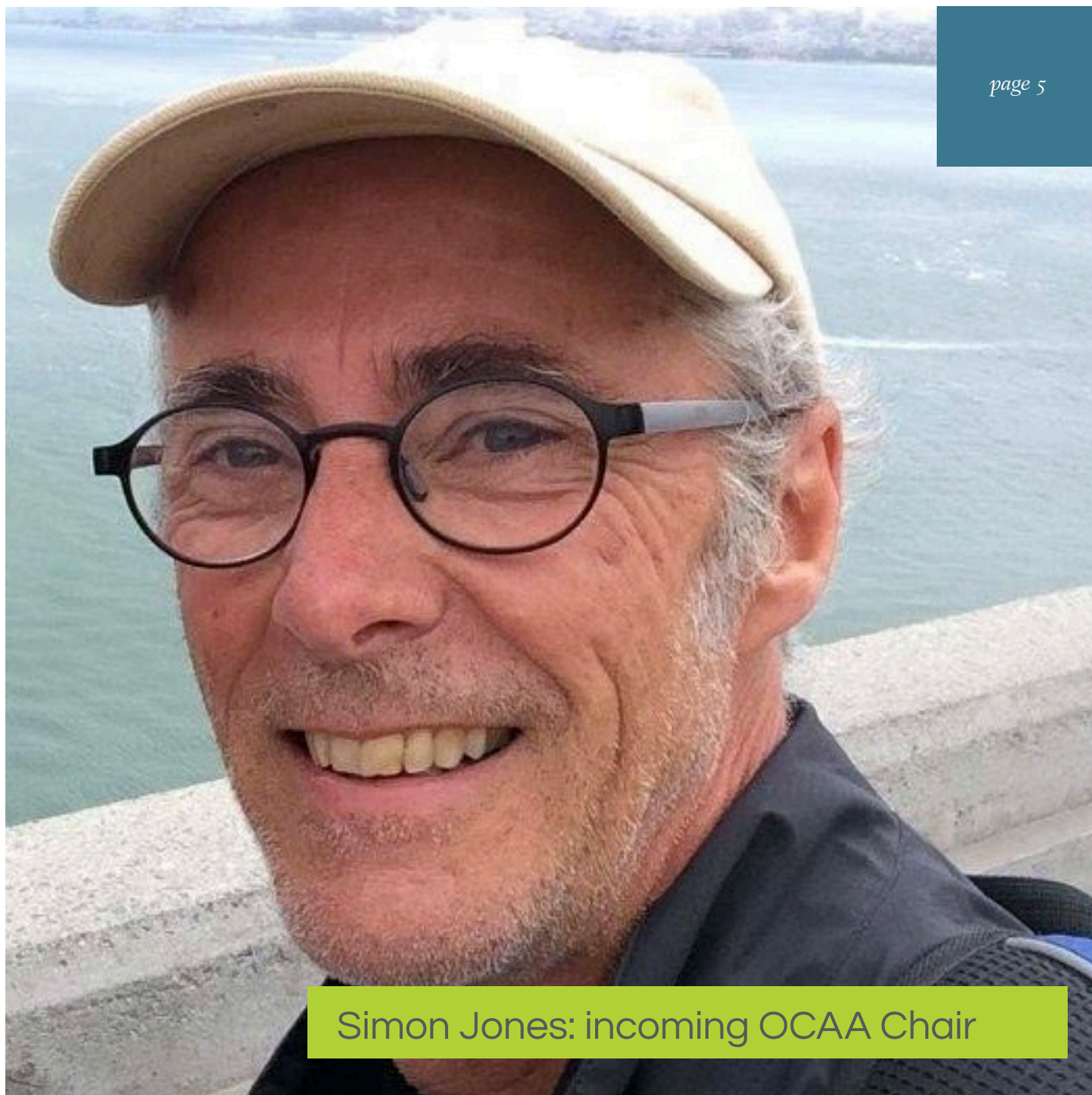
It's free to subscribe, but we encourage people who believe in an organic lifestyle and a sustainable future for the planet to become paid members to help us sustain our project, which is entirely a non-profit, community based initiative.



The Organic and Regenerative Investment Co-operative



OCAA welcomes a new initiative: The Organic and Regenerative Investment Co-operative - a bold Co-operative focused on bringing together farmers, eaters and like-minded investors to preserve, protect and enhance organic and regenerative farmland and food. Through aligned purpose and a community of supporters, we create a more resilient Australian food and farming economy that is changing the way our farmers and investors do business for the better of the planet!



Simon Jones: incoming OCAA Chair

SIMON JONES

Introducing our previous secretary and incoming Chair, with a tribute to inaugural founder and driving force behind the establishment of the OCAA, Tim Marshall.

"I am very honoured to be nominated by the committee for the role of Chairman and I acknowledge the incredible work done by my predecessor Tim Marshall in setting up and chairing OCAA through its first years.

I bring a lifetime of experience in organics with me. From my childhood in England growing a huge organic veggie garden and an organic tomato business with my grandfather, to years as an organic baker and miller in Sydney, right up to the family's most recent businesses in organic veggie boxes and organic ice blocks."

Participatory Guarantee Systems, or PGS, are starting to appear around Australia. They are often associated with local, slow, sustainable, and organic food groups, community gardens and farmers markets.

PGS is used by some farmers markets to certify the local origin

and/or organic provenance of food to guarantee that it is what it claims to be. PGS is always local and community owned and therefore can avoid high cost and much of the bureaucracy of third-party certification.

PGS is empowering because it is participatory, and hence community building.

Most jobs are shared by members and any necessary small expenditures contribute to local employment. It can encompass producer, seller, health, environmental and consumer interests. It is designed to encourage sharing of information between producer members, something that existing certification systems cannot do, so it can encourage the growth of organic and sustainable agriculture.

PGS is a local strategy. To work well it creates a community of people who know each other and can work together. Confidence, trust and shared knowledge arising from PGS can only encourage local development and food sovereignty.

PGS is a genuine form of certification, but it does not comply with government accreditation so PGS produce cannot be exported.

PGS is ideal for direct and local sellers via farmers markets, local shops, box delivery systems or Internet sales).

PGS that are supported by OCAA use the same organic standard and practices, but the 'verification' costs of major certifiers are replaced by participation of local stakeholders.

SCPA - South East Producers is a not-for-profit incorporated association located in the south east of NSW. Members are mainly small holders and backyard gardeners and SCPA runs the longest-established PGS in Australia.

See:

<http://organics.scpa.org.au/pages/>

What is a "Participatory Guarantee System*?"



PGS

"PGS is a low-cost, locally-based system of quality assurance, with a strong emphasis on social control. A PGS is based on diffused technical knowledge, inclusion and collective accountability."

MATCHING UNDER-UTILISED FARM LAND WITH LANDLESS FARMERS

page 7

The primary object of *Food Next Door* is to relieve the suffering or distress suffered by newly arrived migrants and refugee groups, particularly those without access to land and living in rural and regional areas, by supporting these groups to re-engage in farming and grow food, including their traditional foods.

Food Next Door matches under-utilised farmland with landless farmers to support small-scale regenerative farming, growing diverse crops & engaging people from diverse backgrounds to supply food to local households.

The Food Next Door Organics PGS (Participatory Guarantee System) is an organic certification system where the members of the PGS audit and certify other member's farms to the national organic and biodynamic standard. This builds a recognised and trusted brand for consumers in the local community without expensive auditing and levy fees of other third-party accreditors for the farmers involved.

As a member of the PGS you are able to market your produce as organic with the backing of the Participatory Guarantee System. Food Next Door Organics certification will not be recognised for export or large super market chains but rather by the local communities, cafes, restaurants, farmers markets and selling direct to consumers via recognition that your produce is certified to an organic standard or better.



"...nurturing land and nourishing people"

Food Next Door is a unique not-for-profit cooperative, operating in north western Victoria at Mildura. Its mission is "nurturing land and nourishing people".

At the end of March 2021 the small FND Co-op had facilitated regenerative farming practices on 12 acres of land, supported 30 new migrant farmers and their families to farm and be food secure. FND had also facilitated 12 ML of irrigation water to the Mildura Community Water Bank to support water security for the small scale farmers and paid \$200,000

directly to the small scale farmers through the unique subscription marketing service established to ensure that the entire operation runs successfully.

This information has been taken from the Food Next Door web-site

(www.foodnextdoor.org.au)

by Darryl Lang



TWO STANDARDS?

Organic Consumers Association of Australia position on the AS6000 :

Why do we have two standards?

The National Standard for Organic and Biodynamic Produce (the National Standard) is mandated under the Export Control Orders, by the Federal Minister of Agriculture, and all Australian organic exports must be certified to the National Standard.

The National Standard is an 'exports standard' only and does not apply in the domestic market, however, in the absence of any other available document, it became the default 'domestic standard', but it had no legal force.

After a major organic fraud case in 2007, fines applied by the ACCC were used by the Organic Federation of Australia (OFA) to encourage development of the Australia Standard (AS)6000 Organic and Biodynamic Products, and the associated control document, the MP100 Procedures for certification of organic and biodynamic products.

The AS6000 does not mandate certification or labelling, so it remains possible to sell organic products that are not certified. However, courts may refer to Australian Standards and could determine that produce clearly not in compliance with AS6000 is not eligible to be sold as organic.

Which standard should be applied in the domestic and export organic markets:
the National Standard or the AS6000?

Australian Government
Department of Agriculture
and Water Resources

**National Standard for Organic and
Bio-Dynamic Produce**

Edition 3.6
Last updated - 1 February 2015

In 2021, two standards are used by the Australian organic industry. The National Standard and export by five CBs (NASAA Certified Organic, Australian Certified Organic, AUS-Qual, BDRI and OFC), and when combined with control orders it regulates export. Southern Cross Certified (SXC) uses the AS6000.

Farms, handling operations and production facilities may also be certified using the two private standards owned by the largest certification bodies (CBs) or to compliance systems in other countries, in accordance with export facilitation deals negotiated by the CBs. Private standards may also be used for domestic-only certification or organic inputs (e.g. fertilisers) or for retailer certification.

What is the problem?

The application of separate standards in export and domestic markets is not compliant with WTO policies, which demands one standard, and therefore will inhibit attempts to negotiate mutual recognition arrangements with other countries.

Mutual recognition is cheaper and avoids replication of the audit process.

OCAA believes that confusion over which standard applies to imported produce has sometimes obscured correct handling practices at the wharf. In any case Australia needs domestic legislation to protect Australian consumers

Which standard should be applied in the domestic and export markets, the National Standard or the AS6000?

WHICH STANDARD?

The OCAA position on which standard should apply is not decided, and we are not in favour of any standard being adopted without industry wide consultation.

The AS6000 already has some applicability in the domestic market and the National Standard in the export market. Each standard will need some minor adjustments to fill the role.

We need a single standard that is acceptable to domestic consumers and trading partners.

Consideration must be given to cost, benefits, and problems with each of the standards, including the cost of negotiating trade arrangements.

The standard must benefit all producers, processors, and traders regardless of which certification system they use.

A single standard must include clear rules for acceptance of imported organic produce.

The Standards Australia (SA) standards management system is widely respected as an exemplary system (and importantly emphasizes broad industry and consumer representation) but it is not clear if SA will continue to manage the AS6000 without commitment of organic industry resources. Elsewhere in this newsletter you will read that OCAA has lost confidence in the Organic Industry Standards and Certification Council (OISCC) which manages the National Standard.

Clearly whichever standard is selected the cost, reliability and participation in the management system will be an



Southern Cross Certified is the only certification body that currently certifies organic operations according to the AS6000.

**OCAA IS NOT IN FAVOUR OF ANY
STANDARD BEING ADOPTED
WITHOUT INDUSTRY WIDE
CONSULTATION**

important consideration and neither system is suitable without some changes.

Neither standard is currently 'owned' by the organic industry, but the AS6000 could be produced by a Standards Development Organisation (SDO) established by the organic industry.

OCAA believes that the SDO should be owned by the organic industry, ideally established by OIA

with engagement of CB, producer, processor, retailer and consumer interests.

Whichever standard is used must be readily and freely available to current and intending certified operators.

More detail on the AS6000 appears in the first issue of *Biological Journal* at : <https://organicinvestmentcooperative.com.au/biological-journal>



OISCC Loses Confidence of OCAA

Background and Membership of OISCC

Produce may not be exported from Australia with an organic claim unless it has been certified by an accredited certification body. Organic certification is only awarded if the produce complies with the National Standard for Organic and Bio-Dynamic Produce (the National Standard). The responsibility for managing these standards sits with the Organic Industry Standards and Certification Council (OISCC). OISCC appoints the National Standards Sub-Committee (NSsC) to manage the National Standard and make recommendations, but the final decisions are made by OISCC.

OISCC replaced the Organic Industry Export Consultative Committee (OIECC) in 2010. OIECC had been convened by AQIS, but OISCC is an 'industry owned' organisation established under the Queensland Associations Incorporation Act.

Unfortunately, like most Australian organic industry governance structures, OISCC has proven to be dominated by certification interests.

At the time of writing, OISCC has membership from Australian Organic Ltd (AOL), but not NASAA Organic.

Certifier members include :

- Australian Certified Organic (ACO),
- NASAA Certified Organic (NCO),
- Bio-Dynamic Research Institute (BDRI),
- AUS-Qual, and
- Organic Food Chain (OFA).

The inclusion of the NFF might raise some eyebrows, as many would question whether the Federation can claim to represent organic farmers and whether this position is due to AOL's recent membership of NFF.

<https://www.queenslandcountrylife.com.au/story/5985891/australian-organic-joins-nff/#!>

It is perhaps more understandable that the last spot on the Council is held by the Grocery Industry Council, although the OCAA would have preferred a representative from a dedicated wholesaler or retailer, rather than the current supermarket executive. However, it is not clear whether many organic traders have Grocery Industry Council membership. OISCC does not make public the names of the individuals that fill these positions.

Another position at OISCC was held by Choice, but they withdrew stating that organic was not their core business. The Organic Consumers Association of Australia (OCAA) asked to fill that spot in 2019 but were denied membership, eventually, after a long wait and a tardy response.

Recently the certifier Southern Cross Certified, Australia (SXC) withdrew from OISCC citing unavoidable conflict of interest arising from certifier dominance.

**ORGANIC INDUSTRY
STANDARDS AND
CERTIFICATION COUNCIL**



INDUSTRY COHESION?

Apart from managing the National Standard, what else does OISCC do? We do not really know, because OISCC does not make public on its website its constitution or its minutes; however, we presume that it may discuss various aspects of the Australian Government accreditation of certification bodies and export arrangements for organic produce. That would seem appropriate as there is not any other organic industry body that is engaged with the certification of organic exports, although the Phoenix-rising Organic Industries Australia (OIA) was consulted about recent changes to the export regulations.

OIA is the peak industry body, rising from the remnants of the now-defunct Organic Federation of Australia (OFA), but has not been very visible in the industry for the past two years. OIA does not get a role at OISCC but OFA was involved in the predecessor organisation, OIECC.

As OIA becomes established, AOL continues to make a claim to be the peak body for organic in Australia, but this role is not accepted by industry outside of AOL staff and direct interested parties. Even many AOL members see that this claim is disingenuous on many grounds and disruptive to industry cohesion.

Governance concerns at OISCC

The dominance of certifier interests at OISCC raises the spectre of vested interests having an unfair influence, because the certifier controls the standard. In fact, the National Standard must be acceptable to the various international certifiers and



governments with which Australia trades, so the standard itself is not the issue, but how it is applied.

Here it has become unnecessarily complex. Technically, the National Standard applies only to export produce; or so we are told. ACO and NCO also certify to a 'private standard' which is owned by their respective parent companies, and they may offer 'domestic only' certification. SXC certifies to the AS6000 standard, which has some relevance to the domestic market, but cannot be used to access export markets, and they also certify to the National Standard and remain a Government accredited organisation despite not being a member of OISCC. Note that the private standards are very similar to the National Standard with few differences, although they may lag a little behind because standards are continually being updated. The National Standard process usually gives warning of standard changes, which helps to keep the private standards up to date. The National Standard has not been fully reviewed since its inception Under Standards Australia auspice and governance, the AS6000 is reviewed every 5 years.

The first level of complication from this arrangement is that we cannot negotiate mutual recognition of standards with

most of our export markets while we have separate domestic and export standards, because it is outside of WTO rules. Thus, we need to have a single standard that applies for both domestic and export purposes.

The second level of complication is that OISCC, although it is the highest level of industry body convened by the certifiers, and with government participation, has been inadequate to deal with a range of certification matters of concern to OCAA and our organic industry colleagues. Some of these problems arise because OISCC is reluctant both to make clear interpretations of standards and to empower the NSsC to comment upon common misinterpretations of the National Standard. In other words, OISCC has not ever provided the sort of leadership that the broader organic industry expected and thought that they were getting.

We were told everything was in good hands, but the standards setting process have become cumbersome and mired in secrecy under the guise of confidentiality. Information did not flow from the well and OISCC did not meet its own goals with respect to timely response to correspondence from certifiers, certified operators and OCAA.



OCAA CONCERNS REGARDING OISCC

Organic industry chatter leads us to believe that the OISCC National Standard process only relates to exports, but:

- The National Standard is applied in the domestic market, so it seems that the refusal to comment at all on its implementation is morally fraught.
- Certifiers that receive accreditation based upon the National Standard, are free to widely report their gongs in promotional material and the media and to associate their certification mark with an accreditation. They may then apply the same certification mark to products that are, or are not part of the program, in such a way that consumers cannot distinguish between the output of different certification systems. Did you know that many common organic poultry products in Australian stores do not meet the National Standard and may not be exported?
- OISCC is established under the Queensland Incorporations Act, which imposes certain requirements of ethical behaviour upon its members, and would seem to indicate that they could, if they choose, decide to be relevant to the use of the standard wherever it appears (however we have not seen the Deed of Agreement with Government so we cannot be certain to what extent activities of OISCC are constrained by that agreement).
- In the Quality Policy posted on the OISCC website, consumers appear first in the list of obligations for stakeholders. Who are these consumers? Are they only consumers in other countries? And why don't they have a nominated seat at OISCC meetings?

"Beware industry organisations convened from close interest groups, that do not balance these interests with broad participation from parties that use the end products of their service, especially when they espouse confidentiality to an extent that severely limits transparency and proper reporting. "

OISCC abandons process and becomes openly political

OCAA firmly believes that greater transparency and representation of consumers and certified organic operators is needed at OISCC. In light of this, we suggest the following changes to the current OISCC structure and function:

- Include representation from a broad selection of interested parties including consumers, certified growers, processors, and traders.
- Create safeguards that ensure no single interest group can establish dominance over the committee's decisions.
- Publish the OISCC constitution and objectives, the Deed of Agreement with government and the identity of OISCC members.
- Move earlier to use the public comment process to test support for standards changes.
- Ensure that each part of the standard is reviewed within an appropriate time frame.
- Make public any precedent decisions made by certifiers and/or the NSsC, including comments about inappropriate decisions.

The role of OISCC demands that it should be entirely process related, and that industry politics be prevented from having any influence. Unfortunately, OISCC has permitted single-interest views about how the industry should proceed to enter its judgments and, in doing so, has shown deep disrespect of its core task of producing the best possible standard, and in managing the interests of Australian organic growers, processors, and traders.

“OCAA has now lost confidence in the independence and proper functioning of OISCC.”

In the recent sacking of OCAA member, Tim Marshall, from the NSsC, OISCC acquiesced to the views of members who strongly objected to social media posts on OCAA pages, especially those seeking more information on the aquaponic production system at Green Camel. There were other posts questioning other use of the Bud label and about the AS6000. There was an incorrect assumption that Tim Marshall was the author of all these posts; however, despite this misapprehension, Tim Marshall and OCAA affirm the content of those posts, which are completely appropriate and not apparently connected to the work of the NSsC.

[illegible]

What can we do to mend a broken system?

- Certification bodies with genuine systems and intent should resign from OISCC.
- A new system should be established, managed by Organic Industries Australia with support and confidence of government.
- The new system should do away with the dominance of certification bodies. Instead, they should be only one voice together with representation from consumers and certified organic operators who are required to conform with the standard.
- Membership of the standards committee should consist of representatives who have had standard management experience and organic production and processing experts who are unconstrained by allegiance to a particular certifier.
- Industry organisations, certified operators and consumers should write to OISCC and government expressing their lack of confidence in *OISCC*.



HOW WOULD A PROPERLY CONSTRUCTED AND WELL-MANAGED STANDARDS MANAGEMENT SYSTEM RUN?

A properly constructed standards management system would:

- Include representation from interested parties including government, consumers, growers, processors, and traders.
- Ensure that no single interest (such as certifiers) can establish dominance over the committee's decisions.
- Publish its constitution and objectives, the Deed of Agreement with government, and the identity and affiliation of all its members.
- Ensure that submissions to the NSsC were of high quality and consistent before asking the sub-committee to consider any submission.
- Move earlier to use the public comment process to test support for standards changes.
- Ensure that each part of the standard is reviewed within an appropriate time frame (perhaps such that the entire standard is considered in each five-year period).
- Make public precedent decisions made by certifiers and/or the NSsC, including all comments on inappropriate decisions.

Transparency is essential for good governance

OCAA firmly believes that greater transparency and representation of consumers and certified organic operators is needed at OISCC.

In light of this, we suggest the following changes to the current OISCC structure and function:

- Include representation from a broad selection of interested parties including consumers, certified growers, processors, and traders.
- Create safeguards that ensure no single interest group can establish dominance over the committee's decisions.
- Publish the OISCC constitution and objectives, the Deed of Agreement with government and the identity of OISCC members.
- Move earlier to use the public comment process to test support for standards changes.
- Ensure that each part of the standard is reviewed within an appropriate time frame.
- Make public any precedent decisions made by certifiers and/or the NSsC, including comments about inappropriate decisions.

COMPARISON WITH USA

The National Organic Standards Board (NOSB) manages the United States Department of Agriculture (USDA) National Organic Standard for the US Government.

Its membership consists of:

- Four farmers
- Three environmental protection or resource conservation experts
- Three consumer or public interest representatives
- One person with toxicology or biochemistry knowledge
- Two organic handlers
- One certification body
- One retailer with significant organic trade.

Recommendations of NOSB to the National Organic Program are publicly available on their website, as are their work program and meeting agendas; and at least two of their meetings each year are open to the public.

STOP PRESS!

Just before publication of this newsletter, OCAA became aware that OFC has now withdrawn from OISCC.

BOOK REVIEW

Sustainable Agriculture versus. Corporate Greed examines the social and ecological issues associated with large scale farming, including the issues such as land ownership, economies of scale, increase in size of farm enterprises and resulting pressures upon family farming.

Alan Broughton is responsible for the first section, which is an introduction to the economic and social issues of western, industrial agriculture. The production efficiency of large farms is questioned and found to be only true of labor efficiency. Small farms can apply methodologies such as long rotations and multi-cropping and other agroecological approaches to produce more food per hectare than large farms.

Elena Garcia is responsible for the second part of the book which discusses ecological and social issues in Australian agriculture, including the roll of animal agriculture in contributing to global warming, and how animal breeding and better diets may reduce their impact.

The authors then propose a manifesto for sustainable agriculture in Australia. Their suggestions include government support for small farms, reform of intensive animal industries, protection of water quality and withdraw from the WTO.

The book maintains an agroecological approach and covers topics such

as human rights for rural people, including rights to food, “water, employment, housing, education, health care, communication, rest and culture”.

Garcia and Broughton offer a significant criticism of industrial agriculture and a very useful

introduction to alternative agricultural policy.



SUSTAINABLE AGRICULTURE VERSUS CORPORATE GREED: Small Farmers, Food Security & Big Business by Alan Broughton and Elena Garcia

Published by
Resistance Books 2017



ORGANIC CONSUMERS
ASSOCIATION OF AUSTRALIA

© 2021 OCAA

LINKS

Links from AS6000 and OISCC Stories.

OISCC

Organic Industry Standards
and Certification Council :

<https://oiscc.org>

BDRI

<http://www.demeter.org.au>

AUS-Qual

<https://www.ausmeat.com.au>

Organic Food Chain

<http://organicfoodchain.com.au>

*National Standard for Organic &
Biodynamic Produce:*

[https://www.agriculture.gov.au/
export/controlled-goods/organic-
bio-dynamic/national-standard](https://www.agriculture.gov.au/export/controlled-goods/organic-bio-dynamic/national-standard)

Organic Export Orders Review

[https://www.agriculture.gov.au/
export/controlled-goods/organic-
bio-dynamic/review-aus-organic-
export-regulation](https://www.agriculture.gov.au/export/controlled-goods/organic-bio-dynamic/review-aus-organic-export-regulation)

OCAA SOCIAL MEDIA

*Organic Consumers
Association of Australia*

OCAA Facebook:



[www.facebook.com/OrganicCon-
sumersAssociationofAustralia](http://www.facebook.com/OrganicConsumersAssociationofAustralia)

OCAA LinkedIn:



[www.linkedin.com/company/or-
ganic-consumers-association](http://www.linkedin.com/company/organic-consumers-association)



ORGANIC CONSUMERS
ASSOCIATION OF AUSTRALIA

OCAA WEBSITE: www.organic-consumers.com.au

Newsletter design: Dr. Barry Ferrier byronbayinteractive.com