

 ACT LEGISLATIVE ASSEMBLY COMMITTEE OFFICE	
EXHIBIT	6
DATE RECEIVED	18/11/11
INQUIRY	Ecological Carrying Capacity of ACT Region
10th November 2011	




NASAA
certified organic
 AQIS and IFOAM Accredited

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Ms Sam Salvaneschi,
 Committee Secretary,
 Standing Committee on Climate Change, Environment & Water,
 GPO Box 1020,
 Canberra ACT 2601

Dear Ms Salvaneschi,

I am writing to express our concern about the adverse comments made about NASAA at the committee hearing on Wednesday 20th April this year.

NASAA is a well respected organic certifier carrying out organic certifications both in Australia and the Asia Pacific region. NASAA has a well defined Quality Manual and the published NASAA Organic Standards that set the requirements for operators to achieve organic certification.

NASAA is also accredited by the Australian Quarantine Inspection Service (AQIS) for organic products to be exported from Australia. As well NASAA is accredited by the International Organic Accreditation Services (IOAS) to international organic certification criteria and standards. Both these accreditations check that NASAA, when certifying operations, is complying with both it's QM and the Standards that it sets.

The NASAA Organic Standards are also required to comply with the National Standard for Organic and BioDynamic Produce maintained by AQIS as well as the International Federation of Organic Agricultural Movements (IFOAM) Standard.

I would like to explain to the committee the testing procedures for all new applicants to NASAA certification. New applicants must complete an Organic Management Questionnaire signed by the applicant and a JP. Once the questionnaire is received and all the required documentation has been supplied an inspection of the operation is arranged.

It should be noted that both the NASAA Organic Standard and the National Standard (AQIS) require that there shall be 3 years from the last use of a prohibited substance before products can be certified as organic.

All new farms have a composite soil test taken at the initial inspection for testing of Organochlorides (OC's) and Organophosphates (OP's). These test results must be below 10% of the permissible levels published by Food Standards Australia & New Zealand (FSANZ).

Contamination levels above 10% in the soil do not necessarily preclude the area from organic certification. There will then be tissue testing of the product and a full risk assessment carried out to ensure that the product to be certified does not have contaminants over 10% of the levels set by FSANZ.

Where there may be a higher risk it would be a requirement for the certified operator to put in place a testing regime to ensure the integrity of the organic product.

NASAA also has an annual random sampling program to ensure that products meet its Standards.

All operations certified by NASAA are inspected every 12 months to ensure that the operator is complying with the NASAA Standards – after this annual inspection their certification is extended for another 12 months.

It should be noted that CSIRO do not carry out the testing of soil or products this is carried out by a Laboratory accredited by the National Association of Testing Authorities (NATA).

It is very difficult for NASAA to refute the statements made by Mr Giugni as there is no factual data that NASAA could use to refute the claims.

The claims were of a vague nature – When did this occur? What is the name of the operator certified by NASAA?

If this data was supplied NASAA could check it's records. It may be that the operator was certified by another organic certifier altogether.

NASAA has done a check of its records and none of the current certified operators in the Canberra area match with the claims made by Mr Giugni.

NASAA would like to request that the adverse claims against NASAA are not placed in the public domain due to our inability to check the validity of the claims.

It is disappointing that the committee allows persons to make spurious claims against others without the need to supply any validation of the claims being made.

NASAA is committed to maintaining it's credibility as an organic certifier and would not carry out practices that could jeopardize it's credibility both nationally and internationally.

Thank you for informing NASAA of these claims and the opportunity to make comments on them.

Yours sincerely,

A handwritten signature in cursive script that reads "Jan Denham".

Jan Denham,
Chair.