



Notification:	2002
Date:	2nd March 2020
Category:	Certification Body and Certified Operator Guidance
Title:	Further Guidance on Fire Retardant Chemicals and Organic Certification.
Prior Reading:	<u>Notification 1905 – General Guidance – Fire Retardant Chemicals and Organic Certification.</u>

This Notification is to provide further general guidance on what to do if you believe your property and/or crops or irrigation water sources may have been in contact with firefighting chemicals.

As detailed in prior Notification 1905, if you are a certified organic operator, and you reasonably suspect that your certified organic land or produce may have been contaminated with chemicals used during firefighting efforts, you are required to take action.

Appropriate action may including some or all of the below steps:

Step 1: Determine if you are at risk. If firefighting efforts occurred on, or near your land, you may be at risk. Knowledge of ground or aerial control having occurred, residues of pink, or other coloured chemical markers, or the presence of bushfire containment lines on your property are indicators.

Step 2: If you have determined you may be at risk, contact your local fire authority to confirm which chemicals (if any) may have been used in your area.

Step 3: Contact your local state or territory department of agriculture, or private agricultural laboratory for advice on sampling and testing procedures that may be available.

Step 4: Prepare your plan for assessing and mitigating the risk of contamination that is relevant to your produce.

Step 5: Contact your certification body for approval of your plan, or further advice.



Resources:

Through communication with the state and territories fire authorities, Civil Aviation Safety Authority (CASA), and fire retardant / firefighting chemical manufacturers and distributors, we have compiled the following list of chemicals that we believe may have been used by firefighters in the recent crisis:

Trade name	Manufacturer / Australian Distributor	Website / email address
Blazetamer 380	BioCentral Laboratories	www.biocentral-labs.com
Phos-chek (VPfx; WD881; LC95)	Phos-Chek Australia	www.phos-chek.com.au
Forexpan S	Fire and Rescue Australia	www.fireandrescueaustralia.com
FireLimit FL-01; FL-02	Forest Systems	https://firelimit.com.au/

According to publicly available Safety Data Sheets for the above products, these chemical mixtures appear to be generally of low toxicity, and will degrade in the environment. Furthermore, we have not been made aware of the potential for any of the highly publicized Per- and poly-fluoroalkyl substances (PFAS) having been used in bushfire situations in recent times. Many, if not all, of the above products are prohibited inputs according to the National Standard for Organic and Bio-dynamic Produce, and the Australian Certified Organic Standard. So, if they have been applied to organic land or crops, there may implications for the land or produce in question.

Contacting your state or territory fire authority and requesting details on chemicals which may have been applied to your property may be appropriate. Contact details for relevant authorities are listed below:



State and Territory Bushfire Authorities

State	Relevant Authority	Phone	Email / Contact Information
Queensland	Qld Fire & Emergency Services	13 74 68	https://www.qfes.qld.gov.au/forms/ContactUs
New South Wales	NSW Rural Fire Service	02 8741 5555	media@rfs.nsw.gov.au
Victoria	Country Fire Authority (Vic)	03 9262 8444	cfamedia@cfa.vic.gov.au
South Australia	South Australian Country Fire Service	08 8115 3300	cfsmedia@cfs.sa.gov.au
Western Australia	Department of Fire & Emergency Services	08 9454 0777	https://www.dfes.wa.gov.au/contactus/pages/generalenquiries.aspx
ACT	ACT Emergency Services Agency	(02) 6205 2927	esahaveyoursay@act.gov.au
Tasmania	Tasmania Fire Service	(03) 6173 2740	fire@fire.tas.gov.au
Northern Territory	Bushfires NT	(08) 8922 0844	Bushfires.Engagement@nt.gov.au

Standard References

We consider any potential use on certified organic land to be adventitious, or accidental, according to the standards, which means that certification status may not be automatically lost, and if it is, timeframes for re-certification can potentially be shorter. Please refer to sections 1.1.18 of the National Standard 3.7, and 4.7.24 of the Australian Certified Organic Standard 2019 for further details.



Laboratory Testing

Due to the nature of some of these chemicals, they may be difficult to test for, however reasonable qualitative and quantitative characterisation should be possible.

If, based on your assessment of risk at your property, you or your certification body deems it appropriate to conduct residue testing, please contact your local state or territory department of Agriculture.

While we do not recommend any laboratory over another, we are aware that AMAL Analytical may have a testing protocol specifically developed to characterise fire retardant contamination levels in soil, produce, or water. Contact details are below:

AMAL Analytical
27 Shafton Street
Huntingdale, VIC, 3166
Phone: (03) 9544 4111

Website: <https://www.amalanalytical.com.au/services/organic-certification-chemical-residues/>

Department of Agriculture Organic Notice

The federal Department of Agriculture Water and the Environment issued a Notice to the Organic industry in 2018, related to contamination in the organic supply chain. The Notice details a Risk Assessment framework that may be applicable to this situation. The Notice can be accessed here:

<https://www.agriculture.gov.au/export/controlled-goods/organic-bio-dynamic/organic-notices/2018/2018-01>

If you have any queries or concerns about your property or produce, please contact your certification body.

END

Disclaimer: This advice is general in nature, and is intended to provide background information to assist certified organic operators to prepare their own plan for dealing with risk of contamination from firefighting chemicals that may have been used on or near their property. Following the information contained in this document will not provide any guarantee of maintaining certification status for your land or produce, if contamination has been found to have occurred.

