



Industry Brief:

Proposed Changes in the National Standard (Edition 3.8) – Livestock Standards

October 2024

The Department of Agriculture, Fisheries and Forestry (DAFF) has released proposed changes to the National Standard for Organic and Bio-dynamic Produce (National Standard), focusing on livestock management and welfare. Some of the changes could have a significant impact on organic operators, particularly the proposal regarding antibiotic allowance.

This briefing outlines the key changes, their implications, and how they compare to international standards such as the US, New Zealand, and the EU. We strongly encourage operators to review and provide feedback on these changes to ensure their concerns are considered.

THE SITUATION

DAFF has proposed several amendments to the livestock standards in the National Standard, including updates on antibiotic usage, animal welfare, feed and nutrition, and livestock housing. These updates aim to improve welfare practices while ensuring Australian organic standards align with global expectations. However, they could also introduce challenges, particularly around market access and consumer trust.

Key amendments include:

- Allowing the use of antibiotics in specific cases where it is deemed necessary for animal welfare.
- New requirements for pain relief during certain procedures.
- Updated guidelines on feed allowances and housing standards.

The deadline for public consultation is **Tuesday, 12 November 2024, 5pm (AEDT)**.

THE PROPOSED CHANGES

Below, we outline the key proposed amendments. For your convenience, we've included below the relevant section numbers from within the [Proposed Changes Document](#)¹ to help you locate and reference the specific areas that you may want to comment on. When submitting feedback, please refer to these section numbers to ensure your comments are directed to the relevant parts of the Standard.

¹ https://storage.googleapis.com/files-au-ag/agriculture-au/p/prj4f50a98c9cc6adef8d7db/page/national_standard_edition_3.8_proposed_changes_livestock_consultation.docx



Section 1.17: Antibiotic Use

One of the most significant proposed changes is the allowance of antibiotic use in certain situations, specifically when all preventive measures have failed, and animal welfare is at risk. While this proposal aims to balance welfare with organic practices, it could have far-reaching consequences for operators:

- **Potential Benefits:**
 - Allows for essential animal care, particularly for painful or life-threatening conditions.
 - Brings Australia in line with some international practices, particularly those in the EU and New Zealand, where limited antibiotic use is allowed under strict conditions where preventative practices are insufficient.
 - Would require records of treatments but would not lead to the decertification of livestock for antibiotic usage (e.g., topical antibiotic usage in the treatment of pinkeye, mastitis, etc.).
- **Potential Ramifications:**
 - **Risks to Market Access:** Under USDA NOP standards, antibiotic-treated animals can never regain organic certification, including their milk or fibre. Accordingly, the proposed changes would not be applicable to any USDA NOP producers. Introducing antibiotics into Australian standards would create a critical variance, meaning that products from these animals would be excluded from USDA organic certification. This could pose significant barriers for Australian exporters targeting the US market.
 - **Risks to Consumer Trust:** Allowing antibiotic use could diminish the perception of organic products as being antibiotic-free, reducing their appeal in markets that prioritise this distinction. According to a 2023 consumer insights report, 60% of shoppers believe that being chemical-free is one of the most important benefits of organic food, and 32% specifically value organic meat for being hormone- and antibiotic-free². With such strong preferences for antibiotic-free products, the introduction of antibiotic use may risk eroding consumer trust in the integrity of organic labels.

Additionally, the restrictions on antibiotic use vary based on the animal's lifecycle: animals with a lifespan of less than a year may only receive one course of antibiotics, while longer-lived animals are limited to three courses within a 12-month period, to retain their organic status.

² ACIL Allen, Mobium Group, & NielsenIQ. (2023). Australian Organic Market Report - Consumer Insights 2023. Australian Organic Limited.



International Protocols

- **EU and UK:** Antibiotics are allowed when preventive practices are insufficient, aligning with the proposed changes.
- **Canada:** Antibiotics are allowed when medically necessary and when natural treatments are insufficient. For milk, a 30-day withholding period (WP) or twice the WP is required, and more than two antibiotic treatments within 12 months results in decertification. For meat, animals can regain organic status after one year.
- **New Zealand:** Similar to the EU, antibiotics are permitted under limited circumstances. Operators must demonstrate a strong focus on preventive care before resorting to antibiotics.
- **South Korea:** Antibiotics are permitted only to treat infected animals.
- **US:** The USDA NOP strictly prohibits the use of antibiotics in organic livestock production. Any livestock treated with antibiotics, and its products, permanently lose their organic certification.

OTHER CHANGES

While the proposed changes to antibiotic use are a major focus, there are several other notable updates to the livestock standards. These include updates to:

Section 1.18: Livestock Welfare

- Pain relief is now mandatory for painful procedures such as mulesing and flank spaying. Other procedures, like castration and dehorning, recommend pain relief but do not require it:

Table 5 Procedures and treatment

Procedures associated with pain that must be treated with a product in Table A5 of Appendix D	Procedures associated with pain for which treatment with an appropriate product or substance in Appendix D is recommended but not required	Procedures associated with mild and temporary pain that may not require treatment
Mulesing or breeds that require mulesing	Castration	Placement of nose rings in bulls or pigs
Flank spaying or webbing (cattle)	Tail docking	Ear tagging
Castration > 6 months of age	Dehorning or disbudding	Micro-chipping
Dehorning > 6 months of age	Spaying using the Willis Dropped-Ovary Technique (cattle)	[-]

Note: If veterinary surgery is required, appropriate pain relief is permitted at the discretion of the veterinarian.

- Five pain relief products (Appendix D, Table A5) are proposed for use: Lidocaine, Flunixin, Meloxicam, Xylazine, and Tolfenamic Acid. All products except Meloxicam require veterinary supervision, and each has specific withholding periods for meat and milk.



Section 1.16: Livestock Nutrition

- The allowance for up to 5% non-organic feed (when organic feed is unavailable) will be clarified to apply to the daily feed by weight and would not be calculated on a monthly or annual basis.

Section 1.19: Livestock Housing

- Updated and more detailed standards on indoor stocking density and outdoor ranging density are proposed to enhance welfare and ensure adequate space for animals. This is not applicable to temporary housing of livestock during transport, etc.

Section 1.22: Livestock Manure

- Stronger guidelines that aim to prevent environmental contamination from manure and improve sustainability practices on farms.

CALL TO ACTION: WHY YOUR FEEDBACK IS IMPORTANT

The proposed changes, particularly regarding antibiotic use, will have immediate and long-term impacts on organic certification, market access, and consumer trust. Operators must voice their concerns to ensure the Department takes all perspectives into account.

If you disagree with any of these amendments or believe they could negatively affect your operations, your feedback is essential. Without your comments, your concerns may not be considered during the decision-making process.

NEXT STEPS

1. Review the [full document of proposed changes](#).
2. Submit your feedback via [the Consultation Hub](#) by 5pm (AEDT) Tuesday, 12 November 2024.

This is a pivotal moment for the organic livestock sector in Australia. The proposed changes may align with international trends, but they could also create significant challenges—especially for future livestock government-to-government equivalency. For a quicker submission process, align your feedback with the numbered sections in this briefing, highlighting the areas you agree or disagree with. Now is the time to ensure your voice is heard.