INDUSTRY DISCUSSION PAPER

Domestic Regulation Reform

Consultation on a proposed Information Standard under the Australian Consumer Law

Have your say

Responses are sought by 11 December 2026 through workshops, online sessions, a survey or written feedback. Written submissions can be emailed to tom.foster@austorganic.com.

At a glance

What is proposed

- A legally binding definition of organic, set through an Information Standard under the Australian Consumer Law (ACL), developed following ongoing consultation with government since the Senate inquiry into the National Organic Standard Bill 2024.
- One standard for domestic and export production: the National Standard for Organic and Bio-Dynamic Produce, which over 2,500 operators are already certified to.
- Every organic claim backed by independent certification against the National Standard somewhere in the supply chain, with records linking the claim to that certification.
- The same rules for Australian and imported products, including those sold online.
- Enforcement by the Australian Competition and Consumer Commission (ACCC) and state and territory consumer regulators under existing ACL powers, with certifiers continuing to check the operators they certify.
- Recognition of existing certification and a fair transition for businesses that need to change, with particular attention to small operators.

What we want to hear from you

- Whether you support, in principle, domestic regulation of organic claims, and an Information Standard under the ACL as the way to achieve it.
- Which products should be covered, and how claims about organic ingredients, in-conversion and biodynamic products should be handled (Principle 1).
- Where in the supply chain a business needs its own certification, and what would keep certification accessible and competitively priced (Principle 2).
- How imported organic products should be recognised and what records importers should keep (Principle 3).
- What would make breaches easier to spot, report and investigate (Principle 4).
- What transition time, arrangements and support businesses of different sizes would need, including simpler verification for very small operators (Principle 5).
- Examples from your own business of current practices, likely costs, and any harm caused by misleading organic claims.

The 14 questions for discussion appear at the end of each principle. Responses are sought by 11 December 2026.

Participants in this consultation process are reminded that while the Australian Government supports the principal of further work on domestic regulation reform, it has not committed to any specific model, nor a timeframe to implementing reform.

AOL is undertaking this consultation to inform our ongoing dialogue with the Australian Government.

Introduction

Australian Organic Limited (AOL) is seeking your input on how domestic organic regulation should be reformed and work in practice here in Australia. This paper proposes a legally binding definition of organic, set under the Australian Consumer Law (ACL) and based on the standard already used for organic exports. It follows ongoing consultation with the Australian Government, including the Department of Agriculture, Fisheries and Forestry (DAFF), since the Senate inquiry into the National Organic Standard Bill 2024 and the Government's April 2026 response to that inquiry. Your feedback will shape the model and position we take to government.

Organic is a claim about how a product was made. A shopper cannot check how something was farmed or where its ingredients came from simply by looking at it, so they rely on the label and on whoever checked the claim. When a claim is false, shoppers pay for something they did not get, and genuine organic businesses lose sales to those who skip the cost of doing it properly.

Today, organic claims on products sold in Australia are covered only by the ACL's general ban on misleading or false claims (sections 18 and 29). ACL does not and cannot say what organic means in its current format. In its 2022 submission on domestic organic regulation, the Australian Competition and Consumer Commission (ACCC) reported **"difficulties in pursuing misconduct even where there is evidence due to no clear definition of 'organic'"**. In other words, the regulator has the power to act but nothing clear to test a claim against.[2]

A significant number of Australians have lost trust in organic claims. **Independent consumer research firm Mobium**, commissioned by AOL, found in March 2026 that **34% of buyers who had purchased organic in the previous 12 months** reported having been misled by organic packaging at some point, with this rate effectively unchanged from the **33% reported in 2022**. The problem has not eased in the four years between the two surveys. Among those reporting that experience, **84%** said it made them doubt other organic products, and **63%** stated they became less willing to buy organic in future. Across all shoppers surveyed, lack of trust (**35%**) was the most common barrier to buying more organic, after price[1].

Today, a certification mark is the main way a shopper can judge whether an organic claim is genuine. However, many shoppers cannot tell a genuine mark from an imitation. In government-commissioned research by PricewaterhouseCoopers (PwC) in 2022, **almost 1 in 3 shoppers selected a fictitious certification logo, created by PwC for the survey,** as confirming that a product was organic.[10] Under this paper's proposal, shoppers would no longer have to do that checking themselves. Any product sold as organic would require recognised certification, so a claim backed by an invented mark, or by no certification at all, would be prohibited.

Australian households spent **$760 million** on organic groceries in the year to June 2025. Around **one dollar in every seven ($102.6 million)** was spent on products claiming organic status without certification.[11]

PwC's 2022 cost–benefit analysis, undertaken for the Australian Government, is the most recent estimate of what domestic regulation could be worth to consumers and organic operators, however, it did not look at an Information Standard, which is the model put forward in this paper for industry discussion. Instead, it asked what would happen if regulation lifted shoppers' confidence in organic claims from 58% to between 75% and 80%. On that basis it found benefits of **$198–210 million over 20 years** if food and beverages were covered, or **$256–264 million** if all organic products were covered.[4]

[1] These are consumer claims and AOL does not represent them as having been confirmed cases of fraud.

About three-quarters of that benefit would go to genuine producers and a quarter to consumers. When shoppers trust a claim, more of them buy organic and are willing to pay what it costs to produce. Genuine producers also stop losing sales to products that use the word without earning it. The rest goes to shoppers, who genuinely get what they think they are paying for.

Once the cost of running a new scheme is taken out, PwC still found a net benefit of **$70–111 million** over 20 years, though not within the first ten, because confidence takes time to build. An Information Standard would use laws, regulators and certifiers that already exist, so it should cost government less than the scheme PwC looked at. How much benefit it delivers would depend on how well it is enforced. Appendix B explains the modelling.

A practical pathway to domestic regulation

Where the government process stands

Governments have looked at domestic organic regulation many times over the last 20 years, most recently through PwC's 2022 cost–benefit analysis. The National Organic Standard Bill 2024 was a further attempt to establish domestic rules. In its April 2026 response to the Senate inquiry that examined the 2024 Bill, the Australian Government did not support that the Bill be passed in its current form. But it did agree in principle to further work with industry and the states and territories to look at the need for reform and the options available.[8]

The government has committed to further scoping work but has not yet endorsed a regulatory model. After many years of reviews and a Bill that did not pass, our industry now has the opportunity to put forward a practical and, importantly, a pragmatic model to government. AOL is running this consultation so that government's work can draw on a clear proposal that has been tested with the businesses it would affect. We will use what we hear in our discussions with DAFF, Treasury and other Commonwealth, state and territory agencies. To be clear however, this is AOL's and industry's own consultation, not a government one.

The proposed pathway

Following ongoing consultation and discussion with government since the Senate report on the 2024 Bill, AOL is proposing an **Information Standard under the ACL**. An Information Standard is a legally binding rule, made under existing consumer law, that sets out what a claim on a product means and what is needed to back it up. The proposed standard would define organic by linking it to the **National Standard for Organic and Bio-Dynamic Produce (the National Standard)** and would require products sold as organic to be certified to it. Any business calling a product organic would have to meet these rules or be equivalent to it, whether the product is made in Australia or imported.

The ACL lets government make Information Standards that define terms, set labelling and record-keeping rules, and draw on technical standards. Put simply, the National Standard sets the rules for producing and labelling organic products, and the ACL would make them legally binding and give regulators the power to enforce them. AOL is proposing a practical model that builds upon existing law, rather than drafting law from scratch.

While this is the model proposed for discussion, Government would need to work out how to give it legal effect, and some parts may not be possible under the ACL as it stands. If government takes the proposal up, that legal work would show where the model needs to change.[5]

The proposal assumes **one National Standard for domestic and export production**.[6] Most certified operators already work to the National Standard, so using it would mean little change for them. The same certification would cover both markets, with no second standard and no extra audits. Exporters would still need to meet the rules of the countries they sell to, however, more domestic oriented product would be able to enter the export supply chain. The businesses that would need to change most are those making organic claims without certification or certified to voluntary or private standards. Principle 5 in this discussion paper deals with them and this issue.

AOL backs the National Standard for three reasons. It is already the main organic standard used in Australia with over 2,500 operators. The Australian Government has used it to secure organic export arrangements with six trading partners. And because the standard, the committee that advises on it and the certification system around it already exist, it is likely to be the cheapest and simplest option for government. Extending the National Standard beyond export would also raise questions about how it is governed and who has a say in changes to it. That work is still to be done, and Principle 1 discusses it further.

AOL acknowledges that several organic standards are used in Australia today. Creating or using a different standard for domestic sales would leave Australia with two meanings of organic, one for products sold here and one for exports. That would add cost for businesses that sell in both and could shake our trading partners' confidence in Australian organic exports.

Why this pathway

Past attempts to regulate organic claims have relied on a new national law, most recently the 2024 Bill. None has succeeded. There will never be a perfect time or a perfect model, and AOL believes our industry needs to move forward with an option that government could realistically adopt. In AOL's view, a new standalone law is unlikely to pass in the current environment. Government prefers to deal with issues like this through laws that already exist. The most recent example is seafood origin labelling in hospitality, which was introduced in 2025 through a new Information Standard under the ACL rather than a new Act.[7]

As explained above, the ACL already bans false organic claims but does not say what organic means. An Information Standard is the ACL's tool for fixing exactly that. It would give organic a legal definition. Requiring certification would also make enforcement much simpler. Today, a regulator has to prove what happened on a farm or in a factory, often overseas. Under the proposed model, the first question would simply be whether the product is certified, and that can be checked from records maintained by approved certifiers.

There are established precedents for this approach. The closest is the free-range egg Information Standard, which sets the production conditions an egg producer must meet before using the term 'free-range' and requires stocking density to be shown. The seafood standard, made in 2025, has required hospitality businesses since 1 July 2026 to identify whether seafood is Australian, imported or mixed origin. Both use the ACL to make product information clear and enforceable. We are proposing the same approach for how organic products are produced.[7]

The Information Standard would set the rules, but certifiers would still do much of the checking. How certification would work across the supply chain is a main focus of this consultation.

What this consultation needs to resolve

This consultation is about getting the broad direction right before we formally take the model to government. We are not asking whether Australia needs domestic regulation or looking for other ways to regulate.

In AOL's view, the evidence in this paper and in Appendix A, from the PwC modelling and consumer research to the ACCC's experience, already shows that it does. We would, however, like a clear indication of whether you support that direction in principle. The five principles below explain how the model would work and where decisions are still needed. Each ends with questions for you. We want frank views on design, costs and practical issues, so that what we take to government reflects the experience of the businesses that would live with it.

Five principles for domestic regulation

1 A common standard for domestic and export production

The National Standard for Organic and Bio-Dynamic Produce (the National Standard) already covers production, processing, handling and labelling for exports, and is the standard most certified operators in Australia already work to, with **2,549 operators** certified to it at June 2026, compared with approximately 160 certified only to voluntary domestic standards.[11] Using it for domestic sales as well would give Australia one organic standard, with the same meaning of organic at home and overseas which is the system the majority of Australia's organic trading partners utilise. Exporters would still need to meet destination-country requirements.[6]

The Information Standard would need clear rules for different kinds of claims: a whole product labelled organic, a product with some organic ingredients, and biodynamic or in-conversion products. Fortunately, these claims and their definitions are already resolved via the National Standard and its definitions. Those rules would need to work on packaging, menus, websites and brand names, so shoppers can tell exactly what is being claimed and what has been checked.

The key focus of the Information Standard would likely be food and beverages. AOL invites views on how other organic products, such as cosmetics, textiles, pet food and inputs such as fertilisers and pest control products, should be handled, including whether they should be covered from the start, phased in later or left outside the standard, and what additions to the National Standard that would need.

Under this proposal there would be one standard, the National Standard, as the single legal benchmark for organic claims in Australia. Other standards and schemes used in Australia today, including Australian Standard AS 6000, would sit alongside it in the same way as any other voluntary certification scheme: they would not carry legal standing on their own, and any decision on the future of AS 6000 would rest with Standards Australia. Voluntary or private schemes that go further than the National Standard could still have a place, as long as they require National Standard certification as the minimum. Operators whose current certification does not check against the National Standard would need to switch during the transition.

DAFF currently manages the National Standard for export purposes, with advice from the National Standard Advisory Committee. Domestic reform will need to build on these arrangements and keep domestic and export requirements aligned.[6] If the National Standard covers domestic sales too, the role of such a Committee becomes more important. Its membership and the way it consults on changes may need review, so that domestic businesses and consumers have a proper voice. How the standard should be governed if it extends beyond export is a matter for further discussion with government, and AOL welcomes views on it.

FOR DISCUSSION

1. Starting with food and beverages, which other products should be covered, such as cosmetics, textiles, pet food and inputs such as fertilisers and pest control products, and what changes to the National Standard would that need?
2. How should claims about organic ingredients, in-conversion products and biodynamic products be handled on labels, menus, websites and brand names?
3. If the National Standard applies to both domestic and export claims, is the National Standard Advisory Committee fit for purpose, and how might its governance need to change?

2 Independent verification behind an organic claim

Under the proposed model, every organic claim would need to be backed by **recognised independent certification against the National Standard somewhere in the supply chain**. Certification checks what shoppers cannot and gives businesses proof of compliance as products move through the supply chain.

The open question is not whether certification is required, but who holds it. The question for industry is which businesses need their own certification, and which can rely on their suppliers' certification plus good records. The answer should depend on what each business does and how much risk it poses, while keeping an unbroken, checkable chain from the farm to the final label.

Businesses should be able to choose between capable certifiers, get consistent decisions, and have a simple way to complain or seek a review. In 2022 the ACCC warned that if certification were compulsory, unreasonable fees and conditions could shut businesses out.[2]

FOR DISCUSSION

4. Where in the supply chain should a business need its own certification, and where should supplier certification and records be enough? For example, a processor blending organic ingredients may need its own certification, while a retailer selling sealed certified packs could rely on supplier certification and records.
5. What safeguards would keep certification accessible, consistent and competitively priced? Examples might include published fees, consistent audit requirements and the ability to change certifier.

3 Equivalent requirements for Australian and imported goods

An organic claim should mean the same thing wherever a product was made, and this broadly is the background to how organic trade works globally. The Information Standard would therefore apply to imported and Australian products alike, including those sold online, so competing products play by the same rules.

As at November 2026, Australia has organic arrangements with **six markets**: the European Union, India, Japan, Switzerland, Taiwan and the United Kingdom.[12] The products each arrangement covers vary. These arrangements only help Australian products get into those markets. Because Australia does not regulate organic claims at home, there is no system for recognising organic products coming the other way, outside of the current ACL system.

How imported organic products would be recognised is a big question for government. Options could include recognising additional countries as equivalent, building on existing trade relationships, or requiring certification by exporting countries to the National Standard. Each would need to be weighed against Australia's trade obligations, how reliable overseas certification is, and fairness to Australian producers, whose products would have to meet the National Standard in full.

An overseas logo on its own would not be enough. At this stage AOL is seeking industry's views on the principles government should apply, rather than proposing a recognition model.

Whatever approach is taken, importers would need records showing that a product and its supply chain are covered by recognised certification. The rules would also need to deal with products that pass through several countries, products that mix Australian and imported ingredients, and what happens when a certificate expires or a supplier loses certification.

FOR DISCUSSION

6. What principles should government apply in deciding how imported organic products are recognised, and what records should importers have to keep?
7. Where would imported ingredients, mixed supply chains or online sales make organic claims hard to check, and how should that be dealt with?

4 Clear responsibility and effective enforcement

AOL proposes that enforcement of the Information Standard sit with the ACCC and state and territory consumer regulators, using their existing powers under the ACL. The model is designed to need as little new public funding as possible. It relies on existing law, regulators and certification rather than a new agency, and linking claims to certification should make cases quicker and cheaper to investigate than they are today. How responsibilities are shared between regulators is a matter for government to settle with the states and territories.

Certifiers would keep checking the operators they certify, as they do now, paid for through their certification fees. Regulators would enforce the law, including against businesses that make organic claims without being certified. In short, a certifier can suspend or cancel a certificate, but only a regulator can act across the wider market. Under the proposed model, approval and oversight of certifiers, and the handling of appeals against certification decisions, would continue to sit with DAFF, which already performs that role for export certification.

For this to work, regulators need access to organic expertise and reliable certification records, and there needs to be a clear way to report suspected breaches. Shoppers and businesses should know where to raise a concern and what evidence helps. Government and certifiers would need to share information, while protecting confidentiality and avoiding gaps or double handling.

FOR DISCUSSION

8. Where is it currently unclear who is responsible for what in the certified organic system, and what would make breaches easier to spot, report and investigate?
9. What information, guidance and review processes would help businesses, certifiers and regulators make the system work, building on arrangements that already exist?

5 Recognition of existing compliance and a workable transition

Reform should recognise the investment businesses have already made in organic production and certification. AOL's **Australian Organic Market Report 2026** records **2,549 operators** certified under the National Standard at June 2026.[11] An operator already certified to the National Standard should not need to do anything more to sell as organic in Australia. In AOL's experience, many operators who supply only the domestic market already hold National Standard certification because it is widely recognised.

Based on the records available to AOL, approximately **160 operators** are certified **only** to voluntary domestic standards, and other businesses make organic claims without certification. These businesses, and any working to requirements that differ from the National Standard, would need time to adjust, which might mean changing practices, keeping more records and/or getting

certified. The transition should give genuine operators a fair path to comply, while removing misleading claims from the market.

Small businesses need particular attention. The Government's April 2026 response identified implementation and compliance costs as issues to resolve.[8] The Senate inquiry also recorded DAFF's concern about the burden of mandatory certification on smaller producers under the 2024 Bill.[13] In research by KG2 conducted in December 2021, **around two-thirds of the organic producers and processors interviewed described their operations as "small"**. Certification cost and lack of sales or financial benefit were leading reasons for remaining uncertified.[9] We need to work out where existing checks could be recognised, where requirements could be simpler, and where support might help.

The transition period would need to allow for growing seasons, how many audits certifiers can handle, existing packaging stock and the time it takes to update supply contracts and product information. Any simpler checking arrangement for small or low-risk businesses would still need to show the business meets the National Standard. Some countries use participatory guarantee systems (PGS) for very small operators, where producers, buyers and others in a local network check practices together under agreed rules. However, any simpler arrangement of this kind would never mean being allowed to make an organic claim that cannot be backed up by an approved system or scheme.

FOR DISCUSSION

10. Are there practical barriers to operators already certified to the National Standard using that certification for domestic sales, without another audit?
11. What would operators currently certified only to AS 6000 or other domestic standards need in order to move to National Standard certification?
12. Should the model allow simpler verification for very small operators, such as participatory guarantee systems, and should any such arrangement be limited to direct or local sales, for example at farmers' markets? What safeguards would keep those claims credible?
13. What additional work and cost would the proposed requirements create for your business, beyond what you already do? Please distinguish one-off changes from ongoing costs.
14. How much time, and what transition arrangements, would businesses of different sizes need to comply, without weakening the checks behind organic claims?

How to have your say

Consultation will include in-person workshops, online sessions, a survey and written feedback, with responses sought by **11 December 2026**. Written submissions can be emailed to tom.foster@austorganic.com. Producers, processors, importers, consumers, retailers, certifiers and other affected businesses are encouraged to contribute, including non-members and operators who are not currently certified. Participation details will accompany the consultation invitations.

Please respond to the questions relevant to your business. We would also like a clear yes or no on whether your business supports, in principle, (1) domestic regulation of organic claims and (2) an Information Standard under the ACL as the way to achieve it. Examples of current practices, likely costs and suggested solutions will help refine the proposal, as will case studies of harm your business has experienced from misleading organic claims. Concerns are welcome even where a solution is not yet clear. AOL will not attribute comments in its consultation report without consent.

We will pull the findings together, take them to DAFF and Treasury in **early 2027**, and report back to everyone who took part. The report will set out where people agree, the main concerns raised and the design questions still to be answered, and will form the basis of the industry position we take to government.

Reform will also need government policy and legal work, a formal impact assessment and government's own consultation, including with the states and territories on how the rules would be put in place and enforced. No start date has been set. Our immediate aim is to give government a clear, workable proposal and the evidence to move it forward.

Appendix A Evidence of consumer and business harm

The evidence that follows explains both why domestic reform is needed, and what it needs to address. Consumer research measures confusion and loss of confidence. The ACCC's experience shows why false claims can be difficult to pursue. PwC's economic modelling examines the consequences for consumers and genuine producers when confidence in organic claims is weak.

Consumer confidence and purchasing decisions

AOL has commissioned independent research firm **Mobium** to study Australian attitudes to organics through a research program dating from 2009. The March 2026 study used an online panel of **2,014 primary household food shoppers aged 18–69**. Age quotas and geographic weighting were used, with the Northern Territory excluded. Mobium developed the questionnaire in collaboration with AOL.[3]

Among the **1,014 respondents who had bought organic in the previous 12 months**, 34% said they believed they had been misled into buying something labelled or packaged as organic and later found it was not. The comparable result was 33% in 2022. Of the **345 respondents reporting that experience**, 84% said it made them doubt other organic products and 63% said it made them less willing to buy organic in future. Across all 2,014 respondents, 35% identified lack of trust as a barrier to buying more organic, second to price. Respondents could select multiple barriers.

A reported problem with one product weakened confidence in others, creating a commercial risk for businesses whose products are genuine. The survey measures perceptions and stated purchasing intentions; it does not establish the prevalence of proven fraud or the value of sales lost.

Consumers struggle to judge the assurance behind a claim

PwC's government-commissioned consumer research, reported in May 2022, provides a separate test of understanding. The study surveyed 1,006 adults and analysed 899 responses from primary household purchasers. When shown certification logos, **270 respondents, or 30%, selected a fabricated logo as confirming that a product was organic**. The question allowed multiple selections. This demonstrates how readily the appearance of assurance can be mistaken for genuine verification.[10]

Complaint numbers capture only part of the problem

The ACCC received **118 complaints about potentially misleading organic claims between 24 February 2019 and 24 February 2022**, primarily from competitors and certifiers. In its submission, it expressly explained **that low complaint numbers do not establish an absence of harm**: consumers are less likely to complain about claims they cannot readily test themselves. It also identified difficulties obtaining evidence and pursuing cases without a clear definition of organic.[2]

That most complaints came from competitors and certifiers is consistent with the problem described in Appendix B: they are among the few with the knowledge to detect a false claim. These findings support requiring businesses to keep verifiable evidence of their organic claims, giving regulators a clearer basis for checking compliance.

A market without mandatory assurance

NielsenIQ household purchasing data in the **Australian Organic Market Report 2026** recorded **$657.6 million in certified and $102.6 million in uncertified organic grocery purchases** in the year to 29 June 2025. Uncertified purchases represented 13.5% of the $760.2 million total. This covers household take-home groceries, including non-food items, rather than the entire organic market or food service.[11]

The uncertified category is not a measure of false claims. It shows that a material share of organic grocery spending falls outside the certified category. Reform needs to provide credible proof of those claims as well as recognise the assurance already provided by certified products.

Appendix B The economic cost of uncertainty

The PwC lemons and plums analysis

In March 2022, PwC completed a cost–benefit analysis for the Australian Government of a new domestic organic regulatory approach. Its “lemons and plums” analysis explains the market failure: consumers cannot readily distinguish products that meet the claimed organic requirements (“plums”) from those that do not (“lemons”). PwC did not treat every uncertified product as a lemon.[4]

If buyers doubt the claim, they become less willing to pay the price that genuine organic production commands. Genuine producers then face weaker returns, while sellers of falsely claimed products can avoid organic production costs. Over time, this can discourage investment and reduce the supply of genuine products. Consumers lose both through purchases that fail to deliver the claimed attributes and through worthwhile purchases they no longer make.

PwC modelled how clearer requirements and stronger confidence could change prices, production and purchasing. It estimated gains in consumer welfare and producer returns compared with continuing without reform. These are also the benefits forgone if the modelled market problems persist.

What the model values

The table compares PwC’s four regulatory designs. Consumer welfare means the value a purchase provides to a consumer above the price paid. Producer returns are measured after production costs. Figures combine **20 years of benefits in present-value terms, discounted at 7%, before policy costs**. Discounting gives less weight to benefits received further into the future.

PwC regulatory design	Consumer welfare $m	Producer returns $m	Combined $m
Food and beverages with small-business certification exemption	44.6	153.9	198.5
All products with small-business certification exemption	54.3	201.6	255.9
Food and beverages without that exemption	57.3	153.1	210.4
All products without that exemption	64.1	200.0	264.1

Source: PwC 2022, Tables 7–8. Original model values, not updated to 2026 prices. The exemption applied below $50,000 total business turnover; those businesses still had to meet the standard. Export-related benefits are excluded from this table.

The **$44.6–64.1 million consumer component** estimates the benefit consumers miss out on if the modelled problems continue. It does not measure how much they spend on falsely labelled products. The **$153.1–201.6 million producer component** reflects improved returns from a more trusted market. These figures combine benefits over 20 years after discounting; they are not annual losses.

What this means for designing reform

PwC assumed a five-year preparation and transition period, confidence rising from 58% to 75% for food and beverages or 80% for all products, and survey-derived willingness to pay 12% more when claims are more credible. Its results also depend on market growth and production costs. After all modelled costs and benefits, all four regulatory designs had negative net results over ten years but positive results over twenty years, ranging from **$69.8 million to $111.2 million**. Separate tests assuming a 5% willingness-to-pay uplift, or the same market growth with and without reform, produced negative twenty-year net results.

PwC assessed a scheme under new Commonwealth legislation. The proposed ACL Information Standard needs its own assessment of compliance and enforcement costs, recognition arrangements and coverage. PwC’s findings support reform while showing why its costs and implementation timetable matter.

Sources

[1] International and domestic context. FiBL and IFOAM – Organics International, The World of Organic Agriculture 2025, Australia chapter by Kane Frampton (AOL), printed p. 248; ACCC, Organic claims. New Zealand has legislated its framework; compulsory compliance with its Organic Standards Regulations 2025 begins on 31 March 2028. The OECD comparison concerns a legislated framework, not identical rules or completed implementation everywhere. International report · ACCC guidance · New Zealand commencement

[2] ACCC, Domestic organic regulatory framework submission, March 2022, printed pp. 1–3 (PDF pp. 2–4). Covers legal powers, complaints, enforcement difficulties and competition issues. Source

[3] Mobium, Australian Organic Consumer Research, March 2026, PDF pp. 11, 13, 55 and 60. Research commissioned by AOL. Survey methodology, reported misleading claims, effects on confidence and purchasing, and barriers to purchase.

[4] PwC, Cost Benefit Analysis of a New Regulatory Approach for Domestic Organics, March 2022. Sections 3.1–3.3, 4.2–4.4, 5.5–5.6 and 7.3.5–7.3.6; Tables 7–8, 16–17, 32 and 34 (PDF pp. 19–22, 27–28, 33–36, 48–49 and 56–58). Source

[5] Competition and Consumer Act 2010, Schedule 2 (Australian Consumer Law), ss. 134 and 136–137AA; compilation dated 16 September 2026. Source

[6] DAFF, National Standard for Organic and Bio-Dynamic Produce, edition 3.8, particularly sections 4–7; National Standard governance and export guidance. National Standard · Standard governance · Export guidance

[7] ACCC, ACCC releases guidance on free range egg standard; Department of Industry, Science and Resources, Country of origin labelling for seafood in hospitality settings, mandatory from 1 July 2026. Free range eggs · Seafood labelling

[8] Australian Government response to the report into the National Organic Standard Bill 2024, tabled 23 April 2026, pp. 5–6. Source

[9] KG2, Organic Industry Data Collection Report 2022, PDF pp. 4, 6, 12 and 29. December 2021 telephone fieldwork; 358 producers and processors recruited using quotas from KG2's database. The small-operator proportion is 65% in the summary and 68% in the detailed figure; this paper uses "around two-thirds". Source

[10] PwC, Consultation Findings Report, May 2022 (date on the report cover), PDF pp. 14–15 and 23–25. Government-commissioned consumer research; logo recognition question allowed multiple responses. Source

[11] AOL, Australian Organic Market Report 2026, PDF pp. 6–7, 13, 17 and 25–26. National Standard operator count at June 2026, drawn from DAFF data, and approximately 160 operators certified only to voluntary domestic standards. NielsenIQ household purchasing data, year to 29 June 2025; uncertified share calculated as $102.6m ÷ ($657.6m + $102.6m).

[12] DAFF, Manual of Importing Country Requirements, Organics overview and United Kingdom and Switzerland entries, checked 3 November 2026. Five partners are listed in the overview, with United Kingdom recognition described separately. Product coverage varies; Swiss recognition ends on 31 December 2026. Overview · United Kingdom · Switzerland

[13] Senate Rural and Regional Affairs and Transport Legislation Committee, National Organic Standard Bill 2024 report, February 2025, Chapter 2, paragraphs 2.41–2.43. Records DAFF's concerns about certification costs and smaller operators under that Bill. Source

PDF page references count the cover unless a printed page number is specified. Legal and regulatory sources checked in October–November 2026.