



Submission to Senate regarding the National Organic Standard Bill 2024

Australian Grape & Wine
December 2024



Submission

Australian Grape and Wine Incorporated (Australian Grape & Wine) thanks the Senate for the invitation to comment on the National Organic Standards Bill 2024. Consistent with the submission by Australian Grape & Wine to the [Submission to the Domestic Organic Regulatory Framework](#) in March 2022, the wine sector supports the proposal to create a legislative framework to support a National Organic Standard so that the requirements organic goods must meet when they are sold in Australia or imported into Australia are clearly defined. It is noted that the current regulatory framework is 'not fit for purpose' and that Australia is the last nation in the OECD not to have a regulatory framework for the use of the word 'organic' in a domestic context. This creates various problems for organic producers.

A single standard would address concerns that there is no legislated definition of 'organic' and provide greater consistency between the several different standards in use. Differing requirements exist between certifying bodies within Australia. Furthermore, there are no clear and definitive requirements placed on non-certified producers making organic claims. This impacts upon the competitive environment. It creates information asymmetries and confusion to the detriment of consumers, reducing trust and potentially detracting value from the organic market. Furthermore, organic producers are not operating on an even playing field due to different standards and ineffective compliance against false claims. Unsubstantiated organic claims have long been seen as a problem for the genuine organic producers making legitimate claims. While false claims are not thought to have occurred on wine labels, it is quite possible that misleading claims are made through other marketing and promotional material.

Exporting organic goods requires conformity assessments primarily because the standards vary considerably between countries, creating a non-tariff trade barrier. This is burdensome for producers seeking multiple export markets due to the differences between various standards. It makes the auditing process complex and costly. Although a National Organic Standard will not resolve the various non-tariff trade barriers unique to organic producers, it is expected that having a domestic regulatory framework will provide benefits. For example, importers would have to obtain an organic certificate to demonstrate they meet similar requirements to the National Organic Standard, thereby levelling the playing field to some extent.

Australian wine producers have valued their past ability to provide input into the National Organic Standard and have a goal to obtain mutual acceptance with other trading nations with similar standards such as the European Union. It is assumed that the National Standard Organic and Bio-Dynamic Produce published by the Department of Agriculture, Fisheries and Forestry will be adopted. It is thought to be the most widely used over-arching standard in Australia and freely available for producers and consumers to access. Furthermore, it is this standard that organic producers, including those who are processors such as winemakers, have already invested time into aligning this with other requirements of export markets where it has been possible.

About Australian Grape & Wine

Australian Grape & Wine is Australia's national association of winegrape and wine producers with the role to help forge a political, social and regulatory environment - in Australia and overseas - that enables profitable and sustainable Australian Grape & Wine businesses. To do this, activities focus upon the objective of providing leadership, strategy, advocacy, and practical support. Australian Grape & Wine represents small, medium and large winemakers and winegrape growers.

The grape and wine businesses that Australian Grape & Wine supports are unique in agriculture as a value-



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added product with regional exports and food and wine tourism, making a significant contribution to Australia's rural and regional economies and driving economic growth. There are over two thousand producers and approximately six thousand grape growers, a vast majority based in regional Australia. These businesses support employment of over 160,000 people in winegrape growing and production.

Australian Grape & Wine is recognised as the representative organisation for winegrape and wine producers under the *Wine Australia Act 2013* and is incorporated under the *SA Associations Incorporation Act 1985*. Australian Grape & Wine has a history working with the Australian Government to develop and implement policy that is in the best interests of winegrape growers and winemakers across Australia.

Contact

For further information, please contact:

Lee McLean
Chief Executive Officer

Anna Hooper
**Director, Economic and Environmental
Policy**