



Outline for EU organic dairy production without the use of antibiotics for export to the US under the US organic equivalence recognition of the EU

According to the previously established practice for the running of a NOP certified dairy and an EU organic dairy the two units can be at the same holding provided that the separation and identification of the production by the operator is covered in the so-called "handling plan".

As agreed in the equivalence arrangement, all organic animals are subject to EU organic management and the entire production being certified as EU organic. The organic dairy production is equivalent with the organic NOP production except for the requirement prohibiting the use of antibiotics.

Description of the specific characteristics of the production method without use of antibiotics ("handling plan")

Where operators request the complementary documentary evidence relating to production method without use of antibiotics, they must draw up a "handling plan" describing the specific characteristics of the production method used (Art. 63(1) (d) of Regulation (EC) No 889/2008) specifying how production without the use of antibiotics is implemented and submit it to their control authorities or control bodies.

The handling plan should contain the necessary information to permit the identification, separation and non-promiscuity / comingling between the EU organic production and EU organic production without the use of antibiotics at all stages of that production. The handling plan will mainly be constituted of information and documentation required according to the EU legislation (Regulation (EC) No 889/2008 as amended).

Such a handling plan should where relevant state, for farmers, the clear separation of the herd for production without the use of antibiotics using the tool of the animal identification required by Article 75 of Regulation (EC) No 889/2008 not only during veterinary treatment but, for example, at milking. There should be separation of milk storage at the farm, separated collection by the dairy, separated batch treatment at the dairy and clear identification of the product as being produced without antibiotics whilst under organic management throughout all stages of organic production including processing, packaging, storage and transportation. Similar separation and identification requirements should be in place for all operations involved in these later stages.

Conversion to dairy herd for production without the use of antibiotics

Usually an animal may only be brought into a herd if its mother has not been treated with antibiotics during the last third of her gestation. For dairy animals there is the additional possibility of including dairy products from animals in the 'no-antibiotic use' herd so long as those animals have not been treated with antibiotics for at least twelve months prior to production of the milk. This enables the conversion of dairy animals to 'no-antibiotic use' dairy production. If an animal within the 'no-antibiotic use' category is treated with antibiotics the animal loses the ability to remain in the 'no-antibiotic use' herd and cannot be returned to the 'no-antibiotic use' category.

All animals are under EU organic production. Prior to the EU-authorized body issuing the NOP import certificate the control authorities or control bodies must ensure that the production of the herd has been carried out without the use of antibiotics for at least one year.

Veterinary records held according to Articles 76 and 77 of Regulation (EC) No 889/2008 enable the operator to document:

- Which dairy cows that have completed a one year conversion period according to the EU regulation and
- Which dairy cows that have not received any treatments with antibiotics for the last 12 months.

The identification system foreseen by Article 75 of Regulation (EC) No 889/2008 allows for the permanent identification of all animals under organic production and thus the clear identification of the animals belonging to the herd for production without the use of antibiotics.

Verification by CB of conversion and control of production method without use of antibiotics "handling plan"

The control body will control the specific characteristics of the production method without the use of antibiotics "handling plan" and assess the production method.

In the dairy sector it is logical to consider that these specific characteristics are fulfilled for the specific animals identified for organic production without the use of antibiotics. Animals can only join that herd if they have either been born organic (i.e. from a mother that had not received antibiotics during the last third of the relevant animal's gestation) or if they have gone through a conversion period of twelve months under organic management during which time they have not received antibiotics.

If an animal requires antibiotic treatment, Article 76 of Regulation (EC) No 889/2008 requires the declaration of the veterinary treatment to the control authority or control body. The animal will thereafter be permanently excluded from the herd for production without the use of antibiotics (but may be part of the organic herd of the operator producing for the EU market in line with the requirements for such use included in Article 24 of Regulation (EC) No 889/2008).