FACT SHEET • ORGANIC DAIRY PRODUCER GUIDANCE

Emergency Feed Requirements Under the AsureQuality Organic Certification Programme

Preparing for El Niño Summer Feed Shortages in New Zealand

With an El Niño weather pattern expected to bring drier conditions this summer, forward planning is essential to keep your herd fed without jeopardising your organic certification. Because New Zealand organic dairy products are certified for multiple international markets under the AsureQuality Organic Certification Programme, emergency feed rules depend on the specific standards attached to your certification. **Before introducing any non-organic or transitional feed, you must check your market access requirements and obtain prior approval.**

1. Mandatory Pre-Emergency Actions

- **Review Your Organic Management Plan (OMP):** Both the MPI Official Organic Assurance Programme (OER: OPR) and the AsureQuality Organic Standard (AQOS) require your OMP to include a documented contingency plan for feed shortages caused by extreme weather.
- **Apply Before You Feed:** Never feed non-organic or unapproved supplementary feed without first contacting AsureQuality to apply for a dispensation or exception.
- **Verify Market Access:** If your milk enters a multi-market export pool, you must comply with the **strictest** standard applicable to that pool.

2. Requirements by Certification Standard

AsureQuality Organic Standard (AQOS v8)

- **Baseline Rule:** Livestock must be fed 100% organically produced feed.
- **Emergency Allowance:** If extreme weather causes a severe feed shortage, you may apply to AsureQuality for a formal **Exception**/**Dispensation**.
- **Conditions:** Exceptions are granted on a case-by-case basis with clear justification and are strictly time-limited. Approval must be granted *prior* to use.

MPI Official Organic Assurance Programme (OER: OPR)

- **Baseline Rule:** All livestock feed must comply with OER: OPR technical requirements.
- **Emergency Allowance:** Rules around feed shortages are tied to an **Adverse Event** (such as a drought) formally declared by the Ministry for Primary Industries (MPI).
- **Conditions:** Any deviation from standard feeding rules requires formal dispensation approval from AsureQuality (and MPI where applicable). Detailed records of all supplementary feed and dispensations must be retained for at least 5 years.

Canada Organic Regime (CAN/CGSB-32.310-2026)

COR provides two specific pathways for emergencies (Clause 6.4.8):

- **Direct Catastrophic Event (Fire, flood, or extreme weather directly impacting your farm):** Non-organic feed may be used for up to **10 consecutive days**, OR up to **30% non-organic feed for up to 30 consecutive days**. Transitional feed free of prohibited substances must be used in preference to conventional feed. Notify AsureQuality as soon as possible.
- **Regional Forage Shortage (Documented by operator and confirmed by a regional authority where possible):** Non-organic, **non-GE forage** may first be fed to **non-lactating cows and replacement females** (provided they are segregated and visually identifiable). If insufficient, non-organic forage may comprise **up to 25% of the forage ration** for the entire ruminant herd.
- **Mandatory Order of Preference:** (1) Transitional forage; (2) Non-organic forage grown without prohibited substances; (3) Forage free of prohibited substances for at least 60 days pre-harvest; (4) Non-GE conventional forage. You must notify AsureQuality *before* feeding and implement a long-term drought contingency plan.

USDA National Organic Program (NOP) — Strict Prohibition

- **Baseline & Emergency Rule: Zero tolerance for non-organic feed.** Under USDA NOP regulations, feeding conventional or transitional feed to organic livestock permanently revokes the organic status of those animals—even during a declared drought or natural disaster.
- **Pasture & Grazing Variances:** While ruminants must receive at least 30% of their Dry Matter Intake (DMI) from grazing during the grazing season, the grazing season may be paused or shortened in your Organic System Plan (OSP) if drought halts pasture growth. Temporary USDA variances only apply to pasture access rules, never to non-organic feed.
- **Action Required:** All emergency stored feed, silage, hay, or supplements for NOP-certified herds must be **100% certified organic**.

3. Quick Reference Comparison

Standard	Emergency Non-Organic Feed Allowed?	Maximum Limits & Key Conditions
AsureQuality (AQOS)	**Yes (with Exception)**	Must apply for dispensation *before* use; strictly time-limited.
MPI OER: OPR	**Case-by-case**	Requires MPI-declared *adverse event* or dispensation; strict record-keeping.
Canada (COR 2026)	**Yes (Strict limits)**	**Direct disaster:** 100% for max 10 days, or 30% for max 30 days. **Regional shortage:** Up to 25% non-GE forage (non-lactating stock first).
USDA NOP	**No**	**Strictly prohibited.** Any non-organic feed forfeits organic status permanently.

Producer Checklist for This Summer

- [ ] **Calculate Feed Reserves:** Audit current silage, hay, and baleage stocks now.
- [ ] **Lock In Organic Contracts:** Source certified organic supplementary feed early before regional shortages tighten supply.
- [ ] **Check Market Pool Rules:** Confirm with your dairy processor whether your milk is bound by USDA NOP rules before considering transitional or non-organic feed.
- [ ] **Contact AsureQuality Early:** Reach out to your auditor or AsureQuality (organics@asurequality.com) at the first sign of a feed deficit.