

# Public Record

## FILE NOTE

**Exemption request – Prepared or preserved tomatoes, exported to Australia from Italy**

**Record of email correspondence between the Anti-Dumping Commission and Natural Well Pty Ltd trading as First Ray**

Response from First Ray dated 2 February 2015 and 26 February 2015:

Organic tomatoes –

- how organic tomatoes are grown and how this is different to non-organic tomatoes

As an importer and distributor of organic food, I'm not an expert in tomato growing and production per se however according to the Australian Certified Organic website and at a very high level approach, organic is different to non-organic in that organic standards encompass the following:

### What is Organic?

#### *Whole systems approach*

Organics is not just “chemical free”. It is a whole systems or holistic means of growing and handling food. The whole system is linked - Soil. Plants. Animals. Food. People. Environment.

#### *Friendlier*

Certified Organic products are grown and processed without the use of synthetic chemicals, fertilisers, or GMO's.

#### *Innovative*

Organic is an innovative method of farming and production – and is increasingly being recognised as being on the leading edge of food and fibre technology.

#### *Market advantage*

Educated consumers are happy to pay a fair price for the guarantee that the organic produce they purchase is supporting farmers who aim towards ecologically sustainable practices - looking after the

environment we all share. The only way you can be assured you are buying genuine, organic products is to purchase those certified Organic.

#### **Why certified Organic?**

#### *Guaranteed*

In order to guarantee that products are organic, they need to be certified. Organic certification involves auditing an operation's methods to ensure that they comply with the guidelines of organic production.

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## *Rigorous standards*

Standards setting follows a highly transparent process with the industry's key stakeholders providing input via approx. a dozen Australian Organic Advisory Groups. These standards are upheld by rigorous auditing of operations and a third party report reviewing process.

This process itself is audited by government departments and authorities worldwide for ACO to maintain its accreditation as an international certifier.

You may also find the following link helpful which is taken from the European Commission's website and which provides a high level overview of what is organic farming

[http://ec.europa.eu/agriculture/organic/organic-farming/what-is-organic-farming/index\\_en.htm](http://ec.europa.eu/agriculture/organic/organic-farming/what-is-organic-farming/index_en.htm)

- Please describe the production process for organic tomatoes and how this is different to non-organic tomatoes

Please see my response above. You may also find the following information from the European Commission's website helpful which provides an overview of EU Plant Production highlights:

[http://ec.europa.eu/agriculture/organic/eu-policy/eu-rules-on-production/plants-and-plant-products/index\\_en.htm](http://ec.europa.eu/agriculture/organic/eu-policy/eu-rules-on-production/plants-and-plant-products/index_en.htm)

- commercial substitutability of organic tomatoes with non-organic tomatoes ie will customers switch to non-organic tomatoes if organic tomatoes were unavailable for purchase?

No, customers will not switch as a non organic tomato product cannot deliver the properties and values that organic tomatoes can ie. non organic tomatoes cannot guarantee attributes such as chemical free, GMO free, workers' rights, environmental sustainability.

The main reason people buy organic food is for positive health benefits therefore they are not willing to risk the adverse health effects that could come with a non organic product. Another key reason people purchase organic food is to avoid GM products and ingredients. As purchasing certified organic tomatoes is the only way you can guarantee a GM free status, customers will not simply switch and buy a non organic tomato as there would be an element of risk with this and a risk of consuming GM ingredients.

Please find attached a page taken from the Organic Market Report 2014 from the ACO. This page shows the key reasons people purchase organic products and therefore organic tomatoes. These key reasons cannot be simply replicated in a non-organic tomato therefore the commercial substitutability of organic tomatoes with non-organic tomatoes is extremely low to zero.

- if organic tomatoes are preservative and additive free, then is their shelf life shorter? If additives and preservatives are used in non-organic tomatoes to extend their shelf life, then yes, organic tomatoes may have a shorter shelf life as these additives and preservatives are not used however in saying that, organic tomato production may also use a natural ingredient that extends

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the life of the product in which case an organic tomato may not make use of chemicals but it may still have the same shelf life.

- please advise of the criteria to be met for the certification process for organic tomatoes

The criteria that needs to be met for the certification process of organic tomatoes would be dependent on the certifying organic body. To confirm the actual details, a copy of the Standards would need to be obtained from the individual body. Please find below a list of the major organic certifying bodies which would be able to assist you with the specific details you require.

- ACO – Australia
- NASAA – Australia
- Soil Association – UK
- European Commission – EU
- USDA NOP – USA
- Japan – JAS

- are your organic tomatoes certified by ACO (Australia) or the Italian authority or both?

Our organic tomatoes are certified by the European Commission however we are currently working with the ACO to obtain dual certification ie. EU and ACO

## From the Anti-Dumping Commission dated 30 January 2015:

Further to your correspondence of 8 January 2015 and the Australian Industry's response to the Exemption Application, can you please provide some additional information:

### Organic tomatoes

- how organic tomatoes are grown and how this is different to non-organic tomatoes
- please describe the production process for organic tomatoes and how this is different to non-organic tomatoes
- commercial substitutability of organic tomatoes with non-organic tomatoes ie will customers switch to non-organic tomatoes if organic tomatoes were unavailable for purchase?
- if organic tomatoes are preservative and additive free, then is their shelf life shorter?
- please advise of the criteria to be met for the certification process for organic tomatoes
- are your organic tomatoes certified by ACO (Australia) or the Italian authority or both?

Your earliest responses are much appreciated.