



Farm inputs – the problem

Recently products in New Zealand and overseas have been found to be contaminated with quaternary ammonium compounds, such as used for cleaning equipment. These products are also known as DDAC or Didecyl dimethyl ammonium chloride. It is not known how this contamination came about, but in Europe some governments have banned products that have very similar names to others still in use. In New Zealand BioGro in March 2013 withdrew approval of a number of Citrox products for the same reason. Information about this is available on the notifications page of the BioGro website, www.biogro.co.nz. These events make clearer a number of long standing principles and requirements:

- Any product can become contaminated at any time, and even governments cannot stop it happening
- All brought-in materials are used at the farmer's own risk, and farmers must take whatever precautions they feel necessary to protect their farm, their products, their income and their certification.
- If a contaminated product is used and standards are breached as a result, certification may need to be withdrawn, regardless of who is at fault, and regardless of how much care has been taken.
- Demeter New Zealand does not give prior approval for materials to be used. Any approval is limited to approval of documentation as adequate for Demeter purposes at the time it is received. It is always possible that further information may indicate that documentation is in fact not adequate.
- Demeter NZ takes no responsibility for the suitability, safety or otherwise of any product used on-farm. Liability for any damage to a farm, loss of certification or financial loss is a matter between the grower and the supplier of the product.

How to assess a farm input for compliance with Demeter standards

1. First, consider not using it. Biodynamic principles say that the farm should be a self sufficient entity as much as possible. Rudolf Steiner says, in the Agriculture Course, that this cannot be strictly implemented, but that we should strive for it nevertheless. Therefore, farm inputs are not the natural solution to problems and needs on the biodynamic farm.
2. Next, consult the relevant tables in the Demeter standards. For example, if you need a source of phosphorus for soil amendment, tables 5-1 and 6-1 state which materials are allowed. There is a section on "Rock dusts" which says that rock phosphate is allowed so long as it has cadmium levels less than 90mg per kg of P₂O₅
3. Now look at products on the market. You can do this through supplier information or by checking the BioGro website www.biogro.co.nz for the BioGro Directory of Certified inputs.
4. If a product is listed by BioGro, that doesn't mean it is always Demeter acceptable, but in the case of a single ingredient product that the Demeter standards permit (such as RPR), the BioGro listing can be taken as sufficient information.

5. If you are starting the other way around, by looking at product that's been listed by BioGro, and wondering if you can use it, then checking may be more difficult. If the product has more than one ingredient you need to know that all the ingredients are listed as allowed in the relevant tables of the Demeter standards. How do you do this?
 - a. The manufacturer may have published a statement of contents. Ask them if it is complete. Then check that all contents are in the relevant table's list of allowed materials.
 - b. The manufacturer may be willing to tell you what is in it. Ask them for the ingredients list e.g. one manufacturer recently said that its product contained only seaweed and certified organic herbs. Those two ingredients are both listed in the tables as allowed.
 - c. If the manufacturer won't tell you what's in the product, try the other way around. Send them the list from the relevant Demeter standards table and ask them if there is anything in the product not on the list.
 - d. If none of these produces information that the product is compliant, don't use it.

6. Once you have information that a product is compliant, get it in writing. You need to know not just that the product is compliant, but that the particular batch you buy is compliant. That is, if you are relying to any extent on published information about the product, you need a note, a docket or an invoice from the supplier to say that the product they supplied is the one you have the data for.

A well known case involved a grower who ordered compost from a supplier. The grower wanted certified organic compost, but sewage compost came by mistake (the supplier made both). The grower did not have a docket to refer to and so did not realise the mistake until it was too late.

This is why the standards require you to get the product documentation before you use it.

7. Remember that documentary evidence that a product meets particular standards doesn't prove beyond all doubt that it is safe or that it meets the standards. Eating places in NZ display information saying that they meet food standards, but sometimes they still make people sick. There is always an element of risk. The same is true of brought-in materials, no matter how well they have been documented or inspected. The buyer should always beware.

Unannounced inspections

The Demeter standards and the Demeter contract have long provided authority for Demeter New Zealand to conduct unannounced inspections, but to date it has conducted very few. The Assessment Group has decided to adopt the international norm of conducting unannounced inspections on ten percent of licensed properties each year. Another way of looking at this is that, on average, you can expect an unannounced inspection every ten years.

An unannounced inspection is unlikely to take as long as a full inspection. Instead it is likely to concentrate on particular issues or problems, such as previously observed non-compliances. For example, if you have been advised you didn't comply with the standards in the way you used compost preparations in brought-in fertilisers, an unannounced visit might concentrate

on what compost preparations you've used since. We say might, because there may be other things that also need to be part of an unannounced inspection.

Since non-compliances will be an important element in planning unannounced inspections, it follows that the more you have, the more likely you are to be selected for an unannounced inspection.

Education

There's a new question in the Management Plan template. It asks you to describe any programmes of education (including self education) that you have into the background to biodynamics. This comes out of a question at Demeter International Members' Assembly: Where do the pictures and ideas that Rudolf Steiner gave us fit into commercial farming?

The biodynamic preparations come straight out of Rudolf Steiner's vision for agriculture but his intention was that the same vision be applied by the individual farmer to the individual farm where possible.

There are very many ways of approaching this. Some people join discussion groups with other biodynamic farmers, some invite visiting speakers and run on-farm field days, some read books, some go to conferences, some listen to audio tapes.

Do you have any on-going activity to improve your understanding of the deeper aspects of biodynamics? The new question simply asks you to describe any such programme that is active on your property.

Alterations to the Annual Report Form

- A. The Registration section has changed. These pages are slightly rearranged so as to better collect information where a farm has several separate blocks.

Many farms have different blocks, sites or areas that need to be identified separately. For certification purposes "the farm" is all the land you manage. It doesn't include land you have leased out which you therefore don't manage, but it does include any land that you don't own but that you do manage. Any part of "the farm" should be reported as a separate block if any one of the following applies

- It is separated from the rest of the farm, because it's at a different place or is otherwise not contiguous. However if it's just across a road or a fenced-off stream or some minor barrier like that, it need not be treated as separate for that reason alone
- It has a different certification status. For example it might be in conversion to Demeter, new land in the registration year or land that's certified organic but not Demeter. (Different products [e.g. plums instead of peaches] are not difference enough.)
- It has a different ownership structure. For example it may be leased to you or belong to a different family trust so that the contract you have authorising your management is different.

- B. The form now includes a space for you to list the areas of certified crops you grew in the last season. It's information that Demeter New Zealand needs to be able to complete

reports to Demeter International. If this seems onerous, a little reflection will show that it isn't really, because

- If you are a larger grower, measuring crops by the hectare and using whole paddocks for a single crop, you will probably know their sizes for other reasons.
- If you are a small grower, you'll be able to quickly estimate the percentage of your area that is in each crop. For example, if you have half a hectare of garden, you might have 50% in cauliflowers, 20% in cabbages and 10% in each of broccoli, Brussels sprouts and kale.
- Small growers may also be willing to have their crops list amalgamated into "fruit" or "vegetables" rather than listing all the different types. In that case we only need the amalgamated areas.

C. Additional supplementary sheets are now required for labels. A copy of every Demeter label used during the year should be pasted on it. Labels on bulk bins, cartons or sacks should be photographed and the photo attached. (But not pieces cut from bags or cartons). Copies of publicity material should also be supplied and a link given to any information on a web site

Revision of Demeter Certificates

Many, perhaps most, other certifying organisations do not require licensees to sign the certificates. Demeter NZ always has required that, but it creates unnecessary extra work. In the next few months certificates will be revised so that licensees do not have to sign them. However, because the present certificate amends the categories of produce in the licensing contract, a revised contract will be needed too.

Demeter International Products Database

Data is now required to be recorded on an international database for all Demeter licences issued anywhere in the world. When licensees give permission to publish their information, anyone can view it. When they do not give permission, it is available only to Demeter certifiers. To see what is publicly available use the link on the Association's website www.biodynamic.org.nz/demeter.html

At present about half of all licensees' publish their information. Demeter NZ would like to see all licensees publish their information. Making Demeter certification visible is a way of combating false claims of biodynamic status.

Demeter documents

Source of documents

Most of the documents licensees use, including templates and standards are available for download from the Demeter page of the Association's website <http://www.biodynamic.org.nz/demeter.html> The main exception is the annual report form for renewing licensees and applicants. The website form does not contain the information from your last application to check. It is for first time applicants only. If you want a copy of the last form customised for you, please email demeter@biodynamic.org.nz

Sending in your documents

Please do **not** email your annual report and the documents that go with it. We cannot accept applications by email. A paper copy is needed in black and white.