



Demeter-International e. V.

Demeter-International e. V. · Brandschneise 1 · D - 64295 Darmstadt

To Demeter Association, Inc. US,
Elisabeth Candelario,
Paul Dolan, Daphne Amory
Tarry Bolger
CC: To the board of Demeter International

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Document check audit by Demeter International,

Dear Elisabeth,

The AC has done zoom conferences with shared screen to check validity of existing Demeter certification on file samples. Based on the list of the certified projects in 2018 (producers, processors, traders, subcontractors) files have been reviewed and after more than 10 hours of review (6 hours on screen with Sarah) we closed the file screening based on the shared dropbox access and direct communication with certification officer, Sarah Rhynalds.

The results of file screening are the following:

- a. File administration: The existing administration of certification data with dropbox is not very suitable and causes some problems to identify the history of file changes. Dropbox does not seem an adequate tool for certification data administration. Installation of an appropriate data base is needed.
 - > File change history was not completely transparent to the AC because of system
- b. Certification procedures: Some procedures in use in Demeter certification seems to cause quite a lot of work for licensees and administration office. Updating of profiles, operating plans could be streamlined to the very needed data (in addition to the demanded documentary in organic agriculture) and only cover biodynamic aspects. There is a danger that data is not updated when there is a lot of work.
 - > Most of the mandatory documents (profiles and operating plans) are not up to date at all.

- c. Non-conformity letters and licensee response: NC-letters were missing, not in a standardized form, and not systematically in place for each year. Mandatory response letters were often missing and not in a standardized format. Biodynamic System in case of sperate organic certification and in case of inhouse organic verification is not completely clear to the AC.
 - > NC letters are missing; Response letters are missing

- d. Follow up: Certification assessments of files were mostly found, but timely not followed up. Some reviews and communications with clients went over years, so certification process could not be finished on time. There is no clear structure of delays in the correspondence with clients. The follow up by certification was not guaranteed at all during a period of at least 2016-2018
 - > Follow up of non-conformities, of missing documents, responses, profiles and handling plans was not maintained

- e. Certificates: In some of the files that we checked, the certificates covered more time than from date of issue to the defined expiry date. One certificate even covered a year before issue and lasted two years after the issuing date. This is not correct!
 - > Certificates were issued partly to cover certification deficits. This is not serious certification work.

- f. Dates: We encountered a lot of documents which were not dated. Only by tracking the creating document we could date them. Some documents had been updated in later years after creation.
 - > Valid documents (profiles, handling plans, site descriptions etc.) need a date, otherwise cannot be taken as a contribution to current certification. Documents without dates should be excluded.

- g. Personnel: Assessing certifiers were a stable team (Jen Rose Silverman, Andaman Rosse, Kristy Korb, Sally Lammers, et al.). There was in the whole file screening no traces of interactions of board members or unauthorized persons. It was not possible to verify if the mentioned certifiers were authorized to review the Demeter scheme.
 - > No interactions of board members were found in the file screening

Conclusions:

1. Demeter certification documentation of the years between 2016 and 2018 are in poor condition. In most of the checked files we found that documents are missing, documents are not updated or followed up, existing documents were not meeting the certification norms
2. The certification status of the Demeter certified projects, licensees of Demeter US cannot be trusted. The AC was relieved to see that Tarry Bolger and Sarah Rhynalds have the same opinion and they do everything in their power to

update the existing files with each client and ask for missing documents or renew not valid forms in the certification campaign 2018. It is clear that it will last at least another season to make sure that all files can be on track. Licensees are obviously not used to send back promptly the demanded documents!

3. Again, the AC has to confirm that there were no traces found that the board, specially the president Elisabeth Candelario, knew or even supported this poor maintenance of certification. And We still think that she has taken the right measures (by dismissing the responsible certifiers) to give Demeter US the chance to overcome these deficits.
4. The AC still needs an update of renovated certification procedures (as the new organigram, the handling procedures of Demeter inspections and certification (new quality manual), description of the renovated flow of work, new tools (database) and the list of the responsible persons! This is still in progress and is ok to hand in before the new inspection season.
5. Standards and form gap analysis with reverence to the Directions of DI is still open. Tarry offered to provide us a document on this, that will be reviewed by the AC.

We ask Demeter US to hand in the demanded documents within end of April (delay is identic with the Yearly update delay for Demeter International!

Best regards
On behalf of the AC



Dr. Reto Ingold