

Certifying canola as sustainable for the European market

A Practical Guide for Australian Growers



Europe is the prime export destination market for Australian canola, at times buying up to 80% of Australia's exports.

The European demand is founded on the suitability of canola as a feedstock for the European biodiesel industry.

The European Union impose specific sustainability requirements for energy feedstocks used to replace fossil fuels, and Australian canola growers need to adhere to these requirements if their canola is to be exported to Europe for biodiesel.

To ensure Australian canola meets EU sustainability requirements, the grower and parts of the supply chain are required to be certified as meeting the requirements. In Australia, most canola is certified under a scheme called ISCC.

To make compliance easier for growers, the Australian Oilseed Federation (AOF) has established a Central Office to simplify and streamline the paperwork and audit requirements for growers and traders. The Central Office, or process is called 'Sustainable Grain Australia', or SGA.

SUSTAINABLE GRAIN AUSTRALIA CENTRAL OFFICE

How does the Central Office work?

The Central Office provides a 'one stop shop' for growers, enabling you to complete a single 'SGA Grower Sustainability Declaration' on-line through NGR, and providing guidance and support if and when your farm is subject to an audit.

Who can I sell my sustainable canola to?

Most canola traders operate under the Central Office scheme, providing the simplicity that you only need to complete one grower declaration form, which all SGA traders can access through NGR.

How do I complete a Sustainable Grain Australia 'Grower Sustainability Declaration'?

If you want to sell grain to one of the Sustainable Grain Australia participants for the European market you need to complete an SGA 'Grower Sustainability Declaration' using the NGR system. To do this, log into my NGR, select the EDOCS tab and follow the prompts. (Paper based ISCC Declarations will not be accepted).

Assistance can be sought from the NGR Service Centre team on 1800 556 630.

What is ISCC Certification?

ISCC is the certification system used by the Sustainable Grain Australia participants to declare the canola is sustainable, under the requirements of the EU Biofuel Directive. Once certified in accordance with ISCC, Australian canola is able to be sold to European markets as a biofuel feedstock. Further information on the program can be found at www.iscc-system.org

What are the Sustainability Requirements?

You need to be able to demonstrate that you have sustainably produced the crop in accordance with the requirements specified by the EU Biofuel Directive.

This requires that your canola has not been grown on land converted after 2008 from areas such as: primary forest or wooded land, nature protected areas, highly biodiverse grasslands, wetlands and peatland.

You are required to demonstrate that you utilise good agricultural practice.

Examples of typical documentation required to demonstrate compliance includes: spray diaries, agronomist's

recommendations, soil tests and paddock records. You will also need to be able to show the auditor and/or have a discussion how your chemicals and fertilisers are stored, applied and disposed of.

You must also be prepared to discuss how you address the occupational health, safety and the welfare of yourself and your employees.

Should I complete the SGA Grower Sustainability Declaration if I cannot meet the sustainability requirements?

No. If you have any doubts on whether you can meet the requirements, please contact the Central Office.

ON-FARM AUDITS

Who gets audited?

As with any certification system, participants must be prepared to be audited. If you complete a Sustainable Grain Australia Grower Sustainability Declaration' and trade sustainable canola, you may be subject to an audit.

Growers to be audited are selected randomly from the large pool of growers operating under the Central Office, so your likelihood of being audited in any one year is low. Over time, the more years you trade sustainable canola, naturally the likelihood of being audited increases.

Who does the on-farm audits?

Qualified auditors from Control Union, the certifying body, will conduct the audits.

These auditors are experienced in performing these audits on Australian farms. They will be accompanied by a Sustainable Grain Australia representative from the Central Office.

What happens if I am selected for an audit?

You will be contacted by someone from the Central Office who will discuss with you over the phone the audit requirements.

You will also be sent a grower's pack that details the requirements, and helps you prepare for the audit.

You will also be consulted on the requirements of the audit, the preparation required and the time and day that will suit for the actual audit.

How long does the audit take?

It takes approximately 2 hours for the audit. The time is dependent on the availability of the required documents and information provided to the auditor. You should also schedule this amount of time for the pre-audit check, which will be performed 'on-farm' and/or over the phone.

Can I refuse to be audited?

No. Once you sign the self-declaration and deliver sustainable canola you are agreeing to participate in an audit if selected. Only in exceptional circumstances will the certifying body allow growers not to be audited.

If growers refuse an audit it may result in SGA receiving a major non-conformance that may result in the sample audit size being doubled. It may also jeopardise the accreditation and access of Australian canola to the European market.

Is there any cost to be audited?

No. The audit costs are paid for by the industry participants.

Can the auditor provide advice?

No. The auditor is not able to provide specific advice to you.

Where can I seek assistance/advice?

The SGA Central Office can provide all the advice, templates and guidance needed to receive a positive assessment from the audit.

What happens if any issues are identified during the audit?

If the issue is minor the auditor may record an 'observation', which means

that you should consider rectifying the identified issue.

If the issue is more significant the auditor will issue a 'corrective action' to the SGA Central Office, which will then work with you to ensure that the necessary corrective action is taken.

Pre-audit preparatory checks are undertaken to minimise the risk of corrective actions being required.

Can I fail an audit?

Rather than 'failing' an audit, you will be given recommendations regarding non-conformities from the auditor. A written report will be provided outlining these.

How long does a grower have to rectify an issue?

If a 'corrective action' is raised, you, along with the auditor and the SGA Central Office, will agree at the time of the audit on the necessary activities that are to occur to rectify the problem, and a timeframe for completion (maximum of 30 days).

Is there any cost?

No. The participating traders pay for all audit, accreditation and SGA Central Office costs.

If selected for an audit when will they take place?

Audits will typically take place in the June–August period. You will be consulted to ensure a suitable time and day is scheduled.



DOCUMENTS REQUIRED FOR THE AUDIT

1. Business and farm details

This is a summary of the farm including name (ABN), address, details of ownership, details of manager, size of the whole farm, size of the area per crop (for 3 main crops), average yield per crop, GPS coordinate or road side sign address.

The proof you will need:

- A dot point summary of the farm trading name, ownership (phone or electricity bill), name of manager, size of the whole farm, size of the area of the three main crops, average yield of these crops, GPS coordinate or road side sign address.

2. Proof of ownership

This is evidence of the ownership of the land or evidence of control of farming land through leases etc.

The proof you will need:

- Certificates of title, lease agreements and rates notices etc. showing business name as the owner and associated identification of the particular parcel of land. Any sensitive information such as rates etc. can be removed or blacked out.

3. Maps

Maps of whole farm identifying individual paddocks, water courses and natural vegetation. If possible, supply a pre and post 2008 aerial photograph. This is to determine if any land clearing activities have occurred.

The proof you will need:

- Maps from any source including google maps is acceptable.

4. Cropping plan

A cropping plan that identifies each paddock, the crop grown and its rotation, agronomic inputs including seed, fertiliser and chemicals. The plan must also show soil and/or tissue results, the rate the inputs were applied and how and when they were applied.

The proof you will need:

- An agronomist or consultants plan would be sufficient. This can come in print form or integrated into a farm software program.

5. Proof of purchase

The grower must show that approved inputs including seed, fertiliser and chemicals were used and they were applied correctly in accordance with the label.

The proof you will need:

- Examples of invoices showing the purchase of inputs used is to be sighted by the auditor.
- Inventory of all inputs purchased, used, disposed and retained.

6. Spray records

Spray records should include date, paddock name, application rate, name of operator and, if possible, the purpose of the spray.

The proof you will need:

- Spray diaries, notebooks, agronomist/consultant instructions and farm software programs detailing application rates, dates of applications, and how they were applied.

7. Other farm inputs i.e. seed and fertiliser

Other farm input records should include date, paddock name, application rate, name of operator, and if possible, the purpose of the input.

The proof you will need:

- Notebooks, agronomist/consultant instructions and farm software programs detailing what was applied, application rates, dates of applications and how they were applied.

8. Soil nutrient balances

Soil fertility and especially carbon balances must be maintained.

The proof you will need:

- Soil and tissue test results.

9. Chemical storage

The chemical storage must meet Chemcert requirements. This includes sealed floors, ventilation, adequate lighting, bunting/sumps to contain spills.

The proof you will need:

- The auditor will view the site during a farm tour. This is the largest reason for non-conformances. All chemicals must be stored here and there cannot be any stored in other unsuitable storage sites such as machinery sheds,

- Granules must be stored above liquids.

10. General signage and farm safety equipment

The farm must have in place the following:

- Hazard signage, especially where chemicals, fuel and fertiliser are stored and mixed.
- A spill kit – this can consist of buckets of sand being readily available.
- First aid equipment located in high hazard areas.
- Safety showers and eye washers or the equivalent that are located and are readily assessable in high risk areas.
- PPE is assessable to all operators and they are used when appropriate.

The proof you will need:

- That the above are in place and can be viewed by the auditor during the farm tour.

11. Employment, training records

An employment manual or documentation process for all permanent employees. This must show the person's name, that an employment contract is in place, details of training. It is to include dates, the training organization and any associated licences i.e. Chemcert, Forklift, Heavy vehicle etc. certificates and documentation that shows attendance/participation at training events.

At a minimum there must be an induction process for all employees and contractors that operate on the property.

Templates and how to implement the appropriate requirements can be obtained from the SGA office.

The proof you will need:

- Employment, Position description detailing responsibilities and induction manuals or checklists. Training records of employees.

12. OH & S records

A farm safety risk assessment should be conducted that details the specific risks and the subsequent training changes to equipment etc. that is put in place to mitigate the risk.

Templates and how to implement the appropriate requirements can be obtained from the SGA office.

The proof you will need:

- A farm risk assessment and the actions that have been undertaken to mitigate the risk.
- Evidence of training i.e. licences.

13. Equipment calibration records declaration

Records must be available that show that inputs are applied at the stated rates. Equipment calibration records are evidence of this.

The proof you will need:

- Equipment calibration records for boom sprays, spreaders, air seeders etc. This can be a basic log that shows the date and time the calibration took place and who conducted the calibration.

14. Fair Work declaration

A declaration by the farm owner or manager stating that the business abides by the Australian Government's fair work act.

The proof you will need:

- A signed copy. Templates are available from SGA.

15. Summary of production

A summary of production so that the auditor can determine that the quantity harvested is in line with the area sown. This should align with the cropping plan and any other associated records.

The proof you will need:

- Ezigrain or other records showing the production quantities in each paddock and their associated area.

16. Farm waste management plan

A written statement that identifies how waste products are managed. It must include empty chemical containers, general waste, oils, fuels and unused chemicals.

The proof you will need:

- Written statement or receipt for the disposal of these products from bodies such as drumMUSTER, local council/waste management companies, resellers (where applicable), etc.

17. New building and other works

All new buildings and earthworks must be approved by the appropriate authority. This ensures there are no

adverse impacts on the environment.

The proof you will need:

- Council or building surveyor approvals.
- Self-assessments where the above approvals are not required.

18. Copies of grain contracts and delivery dockets

These must be available so that the auditor can track the delivery and export of sustainable grain with the relevant grain purchaser/trader(s).

The proof you will need:

- Grain contracts
- Delivery dockets

19. Business plan

A Business or Farm Plan to show that the farm is financially sustainable is required. Note that the auditor will not view or review this. They just need to know that such a plan is in place.

The proof you will need:

- Business plan or equivalent.



OTHER INFORMATION AND CONTACT DETAILS

The Sustainable Grain Australia Central Office, and participating companies, will consult, give guidance, provide information and templates so that the audit process runs smoothly and efficiently.

Resource materials can be found on the Australian Oilseeds Federation website <http://www.australianoilseeds.com/>

Commodity Inspection Services is responsible for managing the SGA Central Office and the audit program.

Contact James Saunders: Mobile 0433 599 228 or james@cisau.com.au if you have any questions on the audit process and requirements.