

# Comment Disposition Record No. 1

*Public response to the first comments received on the Farm Decision Modelling Standard v1.2*

Issued 8 August 2026

FDMS v1.2, adopted 5 August 2026, remains in force and is unamended by this record

## Why this record exists

The Farm Decision Modelling Standard is published under a change-control rule. A change to the Standard may originate only from reviewer or public comment, from implementation experience, from validation evidence, or from newly published evidence. A preference for different wording is not a source of change. The rule exists so that the Standard is stable enough to be relied on and open enough to be improved, and so that the difference between those two things is visible to anyone who cares to look.

A rule of that kind is worth nothing unless the responses to comments are published. This is the first such record. It covers everything received in the first three days after adoption, states what was accepted and what was not, and gives the reason in each case. Seventeen distinct points were raised. All seventeen appear below, including the ones that were declined and the one that turned out to be a criticism of how the Standard is published rather than of what it says.

## 1. What was received, and from whom

FDMS v1.2 was adopted on 5 August 2026. Two substantive reviews arrived on 8 August, unsolicited. Both reviewed the Standard and the reference workbook together, which is the right way to review it, because the workbook is where the Standard shows its work.

| Reviewer                                 | Class                                                       | Length              | Scope                                                                                   |
|------------------------------------------|-------------------------------------------------------------|---------------------|-----------------------------------------------------------------------------------------|
| Anonymous                                | External, unattributed                                      | approx. 900 words   | Standard and reference workbook                                                         |
| An internal expert reviewer (agronomist) | Internal expert review, agronomy specialist to the practice | approx. 3,300 words | Reference workbook audited formula by formula, with consequences drawn for the Standard |

The second entry in that table is stated plainly because it would be easy, and dishonest, to describe this as two independent external reviews. It is one external review and one internal one. Internal expert review is real evidence and this one was the more detailed of the two by a wide margin, but it is evidence of a different class, and it is recorded as such in the change register so that no future claim about the Standard's review base can quietly upgrade it.

## 2. What both reviewers independently identified

Working separately and from different angles, both reviewers picked out the same feature as the strongest part of the package: the quality-assurance record and the discipline of handover. The external reviewer took the combination of conformance claims, worked workbook and validation history to be what makes the Standard usable rather than aspirational. The internal reviewer described the QA record as what turns a workbook from a spreadsheet its author built into a machine that can be trusted by someone who did not build it.

This is recorded here rather than quietly enjoyed, because it is a finding about the Standard and not a compliment. Element 16, handover and ownership, is the element

with the thinnest evidence base in the whole Standard, and it is disclosed as such in the adopted edition. Two reviewers reaching for it independently as the distinguishing feature is the first external signal on what the Standard is actually for, and it raises the priority of the validation work described in section 7.

### 3. How dispositions are classified

| Disposition                    | Meaning                                                                                                                                                                           |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Accepted in principle          | The point is agreed and the amendment is drafted. It is not in force. It takes effect at the next amendment window.                                                               |
| Accepted, reference workbook   | Agreed and actioned in the workbook. No change to the Standard is required or implied.                                                                                            |
| Accepted, validation programme | Agreed as work to be done, not as a change to any document.                                                                                                                       |
| Already satisfied              | The Standard or its supporting material already does this. Where a reviewer could not find it, the failure is one of publication, and it is fixed by publishing, not by drafting. |
| Routed                         | The point is good and belongs in a different document.                                                                                                                            |
| Noted                          | Recorded, no action at this time, with the reason given.                                                                                                                          |

### 4. Standard-level dispositions

Three of the seventeen points bear on the Standard itself. Each was drafted as a formal change proposal with the current text quoted, the deficiency stated, replacement wording supplied, and the consequences for the signed calibration register worked out. All three were ruled on 8 August 2026. All three were accepted in principle and none is in force.

#### CD-1 • Element 9 • Local calibration of the shock library

Raised by: Anonymous. Disposition: ACCEPTED IN PRINCIPLE, v1.3.

The reviewer observed that nothing requires a user to replace the shipped shock values with their own recent local history before relying on the model, so the scenario controls can work perfectly and mean nothing. Examining the wording showed the problem to be worse than the reviewer described. Element 9 already asserts that the shock library ships with local values, but its pass condition tests only whether a non-author can operate the controls, not whether the values are local. The Standard states one requirement and tests a different one, which is the exact failure it exists to prevent, sitting inside one of its own elements. This is accepted as a defect correction rather than an extension.

The amendment requires each shock to carry its basis: the period and source of the local record used, or an explicit statement that no local calibration was performed and the shipped default is a placeholder. The obligation is to declare the basis, not to achieve accuracy. That construction is deliberate. Requiring calibration outright would make the Standard unmeetable in exactly the places it most needs to be met, in districts with no usable rainfall series, and would produce invented local values, which are worse than a marked placeholder. A marked placeholder is honest and a reader can price it.

#### CD-2 • Element 12 • Non-cash household benefit from retained output

Raised by: the internal expert reviewer (agronomist). Disposition: ACCEPTED IN PRINCIPLE, v1.3, marked as authored rather than evidenced.

The reviewer observed that grain retained for household consumption carries real welfare value in the form of an avoided retail purchase, that a cash model correctly excludes that value, and that a household model which excludes it silently cannot explain the behaviour it is modelling. A household retaining grain at an apparent cash

loss is not making a mistake. It is buying food at farmgate cost rather than retail, and the model shows only the loss.

The amendment requires retained output to be stated as a physical quantity with its avoided-purchase value reported separately, labelled as a non-cash household benefit, and excluded from the cash results and from every headline figure. It is drafted as a disclosure and exclusion rule and never as a valuation rule, because the dangerous error here is not omission but imputation: once consumption value is allowed into the margin, any loss-making plan can be rescued by valuing what the household eats. The pass condition is built to make that detectable. Deleting the imputed value must change no cash figure, no gross margin and no appraisal result, which is checkable by formula audit.

Two qualifications are recorded. The obligation is bounded by the proportionality convention already used elsewhere in the Standard rather than by a numeric threshold, because a numeric threshold in a standard spanning two hectares to three hundred is wrong at one end. And the existing evidence base for Element 12 does not support this construction, so it is marked as authored rather than evidenced, in the same way the Element 13 and Element 14 triggers are marked.

### **CD-3 • Element 5 • Zero-valued own resources**

Raised by: the internal expert reviewer (agronomist). Disposition: ACCEPTED IN PRINCIPLE, v1.3.

The reviewer observed that where a scenario values family labour at zero, the economic-profit test becomes vacuous in that scenario. The question the test asks is whether the plan beats paying the family the casual wage; if the wage is zero the answer is trivially yes, and the model still reports a figure a reader will take as economic profit.

The Standard was already half aware of this. Element 5 forbids pricing owned resources at zero silently. It does not forbid doing so openly, correctly, because there are legitimate cases where a household has no alternative employment. What it never said is what happens to the interpretation of every downstream number once that legitimate choice is made.

The amendment requires the model to state, where any registered scenario values own labour, land or water at zero, that the figures are a return to those owned resources and not an economic profit, and to report the break-even valuation: the wage, rent or charge at which the modelled advantage disappears. That second requirement is worth more than the disclosure. It is a switching value, it is computable, and it tells a household exactly what an outside job would have to pay before the plan stops making sense. A hole in the Standard becomes one of its more useful requirements.

The obligation sits in Element 5 rather than Element 12, with a cross-reference from Element 12. The failure is not confined to households: a commercial model valuing the owner-manager's time at zero commits the identical error at a different scale, and only a placement in Element 5, which is Core, reaches it.

### **Effect on the signed calibration register**

None of the three creates or retires a trigger, and none moves an element between classes. The Standard remains sixteen elements, three classes, twenty-nine binary triggers and two forms of claim, and Signed Calibration Register v1.0 stands unaltered as a trigger record: Case A twenty-five of twenty-nine, Case B four of twenty-nine.

The conformance findings are a different matter and do not survive automatically. Both calibration cases will be re-run against the amended text before the in-force date and the result published whatever it is. If a calibration case fails its own amended

Standard, that will be disclosed in the same way the pricing defect in Case B was disclosed in the signed register. The calibration pair earns its authority by being the place where the Standard is tested against its author, not by passing.

## 5. Reference workbook dispositions

Nine points concern the reference workbook and imply no change to the Standard. All nine are accepted and will be carried in Reference Workbook v1.2.2. They are listed in full because a disposition record that reported only the headline items would be a selective one, and the workbook items were the majority of what was said.

| #     | Point raised                                                                                                                                                                                                                           | Raised by         | Disposition      |
|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|------------------|
| CD-4  | The equity internal rate of return of approximately 226 per cent will be misread. It is a return on household cash under leverage and should be labelled as such, with the project return shown alongside it.                          | Anonymous         | Accepted, v1.2.2 |
| CD-5  | The annuity deduction and add-back chain running between the financials sheet and the appraisal sheet is opaque to a reader who did not build it. Flagged as the highest-priority workbook item.                                       | Internal reviewer | Accepted, v1.2.2 |
| CD-6  | The supplier-trial discount and the learning curve are applied to the same base, so first-year performance is 59.5 per cent of the supplier claim. Correct, but undocumented, and a reader will assume one adjustment rather than two. | Internal reviewer | Accepted, v1.2.2 |
| CD-7  | The carrying cost of channel payment delay is computed at the discount rate where the household's actual cost of capital is the loan rate. The loan rate is the right one.                                                             | Internal reviewer | Accepted, v1.2.2 |
| CD-8  | Break-evens are reported by linear approximation where a one-variable data table would give the exact figure.                                                                                                                          | Internal reviewer | Accepted, v1.2.2 |
| CD-9  | The channel comparison is presented on first-year figures where the third year is the representative case.                                                                                                                             | Internal reviewer | Accepted, v1.2.2 |
| CD-10 | The risk sheet does not say that bad-year readouts move with the uptake lever, so a reader can change one control and misattribute the result.                                                                                         | Internal reviewer | Accepted, v1.2.2 |
| CD-11 | There is no way to return the scenario controls to their base settings other than by remembering what they were.                                                                                                                       | Internal reviewer | Accepted, v1.2.2 |
| CD-12 | Structure should be locked and assumptions left open, so that a user can change what they should change and cannot break what they should not.                                                                                         | Anonymous         | Accepted, v1.2.2 |

Two of these turn out to be the same build. The exact break-even mechanism in CD-8 is the mechanism the Element 5 amendment needs in order to report a break-even wage, so one piece of work satisfies both a workbook item and a standard-level obligation.

## 6. Process dispositions

CD-13. A public change log, recording what changed, why, and what effect it had on headline results, was recommended by the external reviewer. ACCEPTED. This record is the first instalment, and the change register published alongside it carries the full candidate list including items still open and items being monitored without action.

CD-14. A minimum viable core, in the form of a checklist or a deliberately stripped companion template, was proposed to lower the barrier for small advisors and for households using the material without a consultant. ROUTED, and accepted where it lands. This does not belong in the Standard, which states what must be true rather than what is enough to start with, and putting it there would create two tiers of conformance. It belongs in the Body of Knowledge, which is in preparation, and it is a

better fit for the self-assessment instrument planned there than for anything in the Standard.

## 7. Already satisfied, and a publication failure

CD-15. The external reviewer proposed, as a high-value next test, a deliberately minimal commercial decision case that correctly activates only a handful of triggers, in order to show that the Standard scales down and does not simply demand everything of everyone.

That case exists. It is Case B, a three hundred hectare maize enterprise, which activates four of the twenty-nine triggers and is recorded in Signed Calibration Register v1.0 with the basis for every answer. A reviewer who had read the site closely enough to write nine hundred words on it did not know that. The criticism is therefore correct, but it is a criticism of how the material is published rather than of what it contains, and the remedy is publication rather than drafting.

Disposition: ALREADY SATISFIED. Signed Calibration Register v1.0 and Case B will be published alongside the reference workbook rather than held behind it, so that the pair of cases, one activating twenty-five triggers and one activating four, is visible to anyone looking at the Standard for the first time. This is the most useful single thing either review produced, and it cost nothing to fix.

## 8. Validation programme

Two proposals from the external reviewer are not changes to anything. They are validation work, and they are the only two items in either review that would produce evidence rather than improvement.

CD-16. Independent reconstruction of the demonstration case by someone who never saw it built. ACCEPTED into the validation programme. This tests whether the documentation carries what the author knows, which is a question no amount of internal review can answer.

CD-17. A check, three months after handover, on whether a non-author household or extension officer actually changes assumptions and uses the outputs. ACCEPTED into the validation programme, and prioritised. Element 16 is disclosed in the adopted edition as the Core element with the thinnest evidence base. This is the only route to real evidence for it, and both reviewers independently identified Element 16 as the part of the Standard that matters most. That combination decides the sequencing.

## 9. Correction to the record

The internal expert review dates the adoption of FDMS v1.2 as 7 August 2026. The adoption date is 5 August 2026. The correction is recorded here so that anyone citing or quoting that review carries the right date.

## 10. The amendment window, and how to comment

The three accepted items are not in force and will not be patched in individually. FDMS operates a fixed amendment window rather than continuous revision, for a reason worth stating: a standard that amends itself within days of publication teaches its users that the adopted edition is provisional, and that lesson is expensive and hard to unteach. Stability is not a courtesy to the author. It is the property that makes a conformance claim mean anything.

| Stage                                        | Date             |
|----------------------------------------------|------------------|
| Comments close for the first amendment cycle | 30 November 2026 |
| Ruling and drafting                          | December 2026    |

|                                                                      |                          |
|----------------------------------------------------------------------|--------------------------|
| Reference Workbook v1.2.2, demonstrating each accepted obligation    | Before the in-force date |
| Both calibration cases re-run against amended text, result published | Before the in-force date |
| FDMS v1.3 in force                                                   | 1 February 2027          |
| Conformance claims may still be made against FDMS v1.2 until         | 1 February 2028          |

A claim is made against an edition, and a model built and claimed under v1.2 remains a correctly made v1.2 claim for the life of that model. What an amendment sets is the edition against which new claims are made after the in-force date.

Comments on any part of the Standard, the reference workbook or the calibration cases are welcome by email or through the site. There is no form and no registration. A comment that identifies a specific element, trigger or workbook cell is worth more than a general impression, but general impressions are read too. Comments that fall outside the four permitted sources of change are still recorded, and are still answered; they simply cannot on their own produce an amendment.

## 11. What this record does not do

It does not amend the Standard. FDMS v1.2, adopted 5 August 2026, remains in force in the form in which it was adopted, and every conformance claim currently made against it stands. It does not report validation evidence, because none of the material described here is validation evidence: it is comment, from two people, one of whom is internal to the practice. And it does not claim that the Standard has been externally reviewed in any formal sense. One unattributed external reader and one internal specialist read it closely within three days of publication and between them found three things worth changing. That is what happened, and it is all that is being claimed.