

1	Aim
	This policy establishes the guidelines for smallholder group certification by ADITI.
2	Background
	The cost of certification is a serious obstacle for many growers, especially smallholders, making access to organic markets for them difficult. Since nearly 20 years ago, group certification with internal control systems has been developed as an alternative. These systems have now obtained a certain level of official acknowledgement.
3	Normative framework
3.1	<p>NPOP-Chapter 5-Guidelines for Certification of Grower Groups</p> <p>5.1 SCOPE</p> <p>This system shall be based on the Internal Control System (ICS)</p> <ul style="list-style-type: none"> • It shall apply to producer groups, farmer’s cooperatives, contract production and small-scale processing units. • The ICS will have a registered legal identity and a constitution of the organization and shall be presented by an organizational chart. • The ICS must verify and ensure adherence to the requirements of organic certification as per the National Program for Organic Production (NPOP) by the grower group. <p>Basic Requirements of the Group</p> <ul style="list-style-type: none"> • The producers in the group must apply similar production systems and the farms should be in geographical proximity. • Farms with land holding of 4 ha and above can also belong to a group but will have to be inspected annually by the external Inspection and Certification Agency. • The total area of such farms shall be less than 50% of the total area of the group. • Processors and exporters can be a part of the same group but will have to be inspected annually by the external Inspection and Certification Agency. • The grower group shall consist of a minimum of 25 and a maximum of 500 farmers. Processors and exporters/traders can own/ manage the Internal Control System (ICS) but will have to be inspected annually by the external Certification Body. <p>5.3 & 5.4 Internal Control System (ICS) and its development</p> <p>ICS is based on the concept of an Internal Quality System comprising of the following: -</p> <ul style="list-style-type: none"> • Implementation of the internal control system • Internal standards • Risk assessment. <p>The external certification body shall evaluate by checking the IQS documentation, and staff qualifications and re-inspecting some farms.</p> <p>The following are the minimum requirements for setting up an ICS for grower groups: -</p> <ul style="list-style-type: none"> • Development of Internal Control System (ICS) • The ICS office must be situated at the project location and all Grower groups must display the following in a clear and visible place at the ICS office: <ol style="list-style-type: none"> a. A valid scope certificate b. A list of approved member farmers with their contact information.

- Documentation: All ICS documents, including the ICS Manual, farmer details, internal inspection records, training records, and purchase/procurement details, must be available at the ICS office.
- PAN Details of the operator is mandatory and any one of the following government ID of the farmer need to be uploaded in the Tracenet:
 - I. Aadhar Card or
 - II. Voter ID Card or
 - III. Valid Bank Passbook or
 - IV. Kisan Credit Card or
 - V. Ration Card
- Identification of farmers in the group and qualified/experienced personnel for maintaining the Internal Control System
- Creation of awareness about Grower Group Certification and necessary training in production and ICS development
- Implementation of the policies and procedures
- Review and improvement of QMS

STAFF :

The Group Certification shall have defined personnel for effective working of ICS, the defined positions are as follows, Ref 5.4.1 to 5.4.7 Internal Control System Manager (ICS Manager), 5.4.2 Internal inspectors, 5.4.3 Approval manager/committee, 5.4.4 Field officers, 5.4.5 Purchase officers, 5.4.6 Warehouse manager, 5.4.7 Processing manager.

5.12 INTERNAL APPROVALS

The IQS manager will have a defined procedure to approve or impose sanctions on the farmers in the group. All internal farm checklists are screened by internal approval staff with a special focus on the critical control points of risk / difficult cases.

The approval committee for providing internal certification status will check the

- Assessment of the internal inspector. If necessary, conditions will be set out for achieving compliance with the NPOP.
- The next competent person or committee must confirm the results of the internal inspection in an approval procedure.

5.13 EXTERNAL INSPECTIONS

The accredited Certification Bodies shall undertake inspections of the ICS after ensuring that 100% internal inspections by the ICS have been undertaken at least twice for all the registered members of the grower group.

The accredited Certification Body will inspect some of the farms for the evaluation of the grower group for an efficient internal control system for compliance with the NPOP Standards.

The sampling plan for inspection shall be based on the inspector's perception of risk based on the following factors:

1. Size of holding
2. Number of the members in the group
3. Degree of similarity between the production system and crop system
4. Inter-mingling / contamination
5. Parallel production
7. Split production
8. Local hazards
9. Change in the production plan
10. Joining of new members in the group.

5.13.3 Sampling Pattern for verifying the ICS by the accredited Certification Body

The accredited Certification Body shall follow the given pattern below for a minimum number of farmers for inspections:

- High risk: 2 X square root of the number of farmers
- Medium risk: 1.5 X square root of the number of farmers
- Low risk: square root of the number of farmers

5.14 YIELD ESTIMATES

Yields will be estimated for each crop for individual farmers in the group by the ICS. This activity should be carried out, especially during harvesting and should be counter-checked with the estimates during external inspection by the accredited Certification Body.

5.15 NON-COMPLIANCES AND SANCTIONS

In case of non-compliance, the IQS shall take corrective or mitigating measures.

- Procedures for the implementation of sanctions will be defined in case of non-compliance.
- Sanctions have to be documented (list of farmers issued sanctions, documentation of identified non-conformities in the files).

Farmers who have used prohibited inputs on their farms must undergo again the full conversion period (if they remain in the group). In such cases, it has to be checked whether the farmers have **already delivered produce** and whether this (now no longer certified) produce has been mingling with other produce. If this has been the case, the certification body needs to be notified immediately and the mingled produce kept separate until further instructions.

5.16 TRAINING OF ICS PERSONNEL

1. Each internal inspector will be trained annually by a competent person.
2. The date of the training, and list of participants will be documented.
3. The date of participation and content of the training of all IQS staff needs to be documented in the staff files.

5.17 TRAINING OF FARMERS

The IQS manager will organize regular training for the farmers in the group: -

- Each farmer needs to receive at least one initial advisory visit by the extension service or in an organized training.
- The list of participants and content of the training needs to be documented.

5.18 BUYING PROCEDURES

To ensure the genuineness of the products from the group, the following minimum requirements should be followed during buying: -

1. The status of the farmer in the group should be checked.
2. The supplied amount should be compared with the harvested amount and estimated yield. In case of doubt, the product is kept apart until clarified by the ICS manager.
3. The delivered quantity of the product will be registered in the purchase record.
4. The farmers will be issued a receipt duly signed by the purchase officer stating the quantities of the product delivered with the date.
5. All documents have to indicate the status of the certified product (organic or in conversion).
6. Bags should be labelled as 'organic' or as 'in-conversion'.

5.20 PROCESSING

	<p>During the handling of the produce, the documentation must be checked for compliance with the NPOP standards.</p> <ul style="list-style-type: none"> • The external inspection and certification body will inspect central processing units. • Ingredients and processing aids must be used as defined in Annexe-4 and 5 of Section-3 of NPOP standards. • During the product flow (transition), the products should be separated from non-organic products. • The processing steps will be documented. <p>Appendix 1-8 on NPOP Chapter 5 details on specimen formats to be incorporated into the ICS.</p>
3.2	<p>The US National Organic Standard (NOP) (§205.101) establishes that operations with less than 5,000 USD annual agricultural gross income from organic sales, are exempt from certification. These producers are not allowed to use the USDA-NOP seal. The products from such operations shall not be used as ingredients identified as organic in processed products produced by another handling operation. This paragraph is intended more for individual growers, who sell their produce directly to consumers, not for groups, whose total gathered sales usually exceed the above-mentioned sum. Nevertheless, it gives a legal frame for systems of organic market access without individual inspection by professional approved certifiers.</p> <p>The NOSB Accreditation Committee issued a draft recommendation (April 17, 2002), on Criteria for certification of Grower Groups. They also conclude that as “cooperative” and “association” are included in the definition of “person” (section 205.2, of the Final Rule), grower groups, organized as cooperatives or associations, can seek certification as one operation under the NOP without a change to the Final Rule. The requirements for Production Process Manager (PPM), a category for JAS organic certification under the Japanese organic regulation is reportedly set with a group organization in mind. (The Organic Standard, May 2002).</p>
3.3	<p>COS: COR OM</p> <p>C.12 Requirements for grower group certification under COR</p> <p>C.12.1.3 The grower group composed of production units, sites, or facilities, shall be recognized as a "person" according to part 13 of SFCR</p> <p>C.12.1.4 The grower group may be organized on itself, that is, as a cooperative, or as a structured group of producers affiliated to a processor.</p> <p>C12.1.5 All members of the grower group shall apply similar production systems and should be in geographical proximity to each other. Only small farmers can be members of the group covered by group certification. Large farms can also belong to the group but have to be inspected annually by the CB.</p> <p>C.12.1.6 The grower group shall be established formally, based on written agreements with its members. It shall have a central management, established decision procedures and be a legal entity.</p> <p>C.12.1.7 The grower group shall have in place an effective and documented internal control system (ICS).</p> <p>C.12.1.9 The practices of the grower group operation shall be uniform and reflect a consistent process or methodology, using the same inputs and processes.</p>

C.12.1.10 Participation in the grower group shall be limited to those members who market their organic production only through the grower group, A member of a group of operators shall register to only one group of operators for a given product. The maximum size of a group of operators shall be 2,000 members.

C.12.2 Requirements for Internal Control System (ICS)

C.12.2.1 The grower group shall document and implement an internal control system (ICS) for supervision and documentation of production practices and inputs used at each sub-unit, and collected at each production unit, site, or facility. An identified person or body is responsible for verifying compliance with the Canada Organic Regime of each member of the group.

C.12.2.2 Internal Control system (ICS) shall include a contractual arrangement with each member of the grower group.

C.12.2.3 The Internal Control system (ICS) shall be implemented by competent personnel including the ICS manager and ICS inspectors. ICS Internal inspectors designated by the grower group shall carry out internal controls.

C.12.2.4 Adequate number of ICS inspectors shall be identified from within the group based on the type, structure, size, products, and activities of the group. The ICS inspectors shall be trained annually, and their knowledge shall be assessed and documented at the end of the training.

C.12.2.5 The ICS inspectors shall carry out at least 1 annual on-site inspection visit to each individual member including visits to fields and facilities. Any additional risk-based inspections shall be conducted in accordance with the schedule and the procedures provided by the ICS manager.

C.12.2.6 The ICS inspectors shall draft internal inspection reports and submit it within a timeframe specified in the ICS to the ICS manager.

C.12.2.7 The Internal Control system (ICS) shall contain appropriate records including:

- production description, production and/or preparation specifications for products to which the application applies.
- maps, description of the farms and the facilities of all members
- list of inputs (ingredients and agricultural substances)
- a copy of organic production and/or preparation plans
 - traceability records, including information on the quantities, of the following activities, where relevant:
 - purchase and distribution of farm inputs including plant reproductive material by the group.
 - production including harvest.
 - storing.
 - preparation.
 - delivery of products from each member to the joint marketing system.
 - placing on the market of products by the grower group.
 - corrective actions required by the CB during the previous certification cycle, as well as any corrective measures implemented by members concerning these requests.
- a complete list of registered group members
- continuous verification of implementation of the internal inspections
- summary of the internal inspection reports

- the training of members of the group on the ICS procedures and the requirements of COR
- the approval of new members in an existing group or, where appropriate, the approval of new production units or new activities of existing members upon the approval by the ICS manager on the basis of the internal inspection report

C.12.2.8 The Internal Control system (ICS) shall have a mechanism to remove noncompliant group members from the list. The CB should be notified when a (noncompliant) member is sanctioned and/or when voluntarily withdrawn.

C.12.2.9 The Internal Control system (ICS) shall record all nonconformities. The ICS shall require from the operator to respond to the NC report issued by the ICS within 30 working days of its receipt. The response shall either provide evidence of completion of corrective action taken to address each NC or present a plan with milestones as to how each NC will be addressed. This plan shall include a completion date not exceeding 90 working days from receipt of the NCs. The ICS shall accept times greater than those stated for the closure of an NC as long as they are justified and documented.

C.12.3 Initial certification

C.12.3.3 The number of group members subject to the initial certification inspection shall be based on the results of a risk assessment.

C.12.3.3.2 For normal risk situations, the number of group members subject to the initial certification inspection shall not be lower than the square root of the total number of units under the responsibility of the group.

C.12.3.3.3 If the risk is medium, the resulting number from C.12.3.3.2 shall be multiplied by 1.2.

C.12.3.3.4 If the risk is high, the resulting number from C.12.3.3.2 shall be multiplied by 1.4.

C.12.3.3.5 All calculation totals from C.12.3.3.2 – C.12.3.3.4 ending with decimals are to be rounded up.

C.12.3.5 During the certification inspection the VO shall determine whether:

C.12.3.5.1 All internal control documentation is in place

C.12.3.5.2 Internal inspections of all group members have been carried out annually

C.12.3.5.3 New group members are only included after the successful resolution of any NCs found during the internal inspection, according to the procedures agreed with the CB

C.12.3.5.4 all noncompliance have been dealt with appropriately by the ICS

C.12.3.5.5 inspection records have been maintained up to date by the ICS

C.12.4 Maintenance of certification

C.12.4.1 Each year the CB shall define and justify a risk-based sample of members subject to annual inspection to assess the effectiveness of the ICS. The minimum number of members subject to annual CB inspection shall be the square root of the total number of members multiplied by 1.5.

C.12.4.2 In cases of high-risk situations the CB shall increase the number of group members subject to annual inspection to at least 2 times the square root of the number of the members in the grower group (for example, ICS has issued a lot of internal sanctions, or a lot of new grower members).

C.12.4.3 The members visited by the CB shall be predominantly different from 1 year to another. In addition to the risk factors defined at C.12.3.3.1, the CBs may consider the following selection criteria when selecting the sites being subject to visits:

- results from internal control system inspection

- complaint files
- significant variations in the sites' size
- modifications since the last certification

C.12.4.4 The CB shall ensure that the grower group maintains an updated list of all members and informs the CB in a timely manner anytime there are changes to the status of the members and changes to the group as a whole.

C.12.4.5 The CB shall ensure that the grower group has established procedures for adding new members to the grower group.

C.12.6 Certification documents

C.12.6.1 The CB shall provide certification documents to the grower group as a whole. Members within a grower group that have had its operations or product certified cannot possess individual certificates unless that member has obtained its own certification independent from the grower group for a different product.

3.4 EU Regulation 2018/848, Regulation (EU) 2021/279, EU 2021/715 :

EU 2018/848, Group of operators (Article 36):

1. Each group of operators shall:

(a) only be composed of members who are farmers or operators that produce algae or aquaculture animals and who in addition may be engaged in processing, preparation or placing on the market of food or feed;

(b) only be composed of members:

- a) of which the individual certification cost represents more than 2 % of each member's turnover or standard output of organic production and whose annual turnover of organic production is not more than EUR 25 000 or whose standard output of organic production is not more than EUR 15 000 per year; or

(ii) who have each holding of maximum:

- five hectares,
- 0,5 hectares, in the case of greenhouses, or
- 15 hectares, exclusively in the case of permanent grassland;

(d) have legal personality;

(e) only be composed of members whose production activities take place in geographical proximity to each other.

(f) set up a joint marketing system for the products produced by the group; and

(g) establish a system for internal controls comprising a documented set of control activities and procedures in accordance with which an identified person or body is responsible for verifying compliance with this Regulation of each member of the group.

2. Control bodies, shall withdraw the certificate for the whole group where deficiencies in the set-up or functioning of the system for internal controls, in particular as regards failures to detect or address non-compliance by individual members of the group of operators, affect the integrity of organic and in-conversion products.

Regulation (EU)2021/279:

• **Composition and dimension of a group of operators (Article 4, 2021/279):**

a) The maximum size of a group of operators shall be 2000 members.

• **Documents and records of a group of operators (Article -5,2021/279):**

a) The list of members of the group of operators based on their registration of each member and consisting of the following elements for each member of the group of operators:

- a. Name and identification (code number), Contact details, Date of registration, total land surface under the management of the member and whether it is part of an organic, in-conversion or non-organic production unit.
- b. Information on each production unit and/or activity: size, location, including a map where available, product, date of the beginning of the conversion period and yield estimates.
- c. Date of the last internal inspection with the name of the ICS inspector.
- d. Date of the last official control performed by the control body with the name of the inspector and Date and version of the list.

b) The signed membership agreements between the member and the group of operators as legal person, which shall include the rights and responsibilities of the member.

c) The internal inspection reports signed by the ICS inspector and the inspected member of the group of operators and including at least the following elements:

- a. The name of the member and the location of the production unit or premises, including purchase and collection centres
- b. The date and starting and ending hour of the internal inspection.
- c. The findings of the inspection.
- d. The audit scope/perimeter.
- e. The date of issue of the report.
- f. The name of the internal inspector.

d) The training records of the ICS inspectors consisting of:

- a. The dates of the training.
- b. The subject matter of the training.
- c. The name of the trainer.
- d. The signature of the trainee.
- e. Where appropriate, an assessment of the knowledge acquired.

e) The training records of the members of the group of operators.

f) The records of the measures taken in case of non-compliance by the ICS manager, which shall include:

- a. The members are subject to measures in case of non-compliance, including those suspended, withdrawn, or required to comply with a new conversion period.
- b. Documentation of identified non-compliance.
- c. Documentation of follow-up of the measures.

- g) traceability records, including information on the quantities, of the following activities, where relevant:
 - a. Purchase and distribution of farm inputs including plant reproductive material by the group.
 - b. Production including harvest.
 - c. Storing
 - d. Preparation.
 - e. Delivery of products from each member to the joint marketing system.
 - f. Placing on the market of products by the group of operators.
- h) The written agreements and contracts between the group of operators and subcontractors include information on the nature of the subcontracted activities.
- i) The appointment of the ICS manager.
- j) The appointment of the ICS inspectors as well as the list of ICS inspectors

• **Minimum percentages of controls and sampling: (Article 7 of 2021/279):**

- a) A minimum of 2 % of the members of each group of operators shall be subject to sampling in accordance with Article 14(h) of Regulation (EU) 2017/625 every year.
- b) A minimum of 5 % of the operators that are members of a group of operators, but not less than 10 members, shall be subject to re-inspection every year. Where the group of operators has 10 members or less, all members shall be controlled in connection with the verification of compliance referred to in Article 38(3) of Regulation (EU) 2018/848.

Regulation (EU) 2021/715: (Amendment to EU 2018/848):

The system for internal controls (ICS) shall comprise documented procedures on:

- (i) the registration of the members of the group;
- (ii) the internal inspections, which include the annual internal physical on-the-spot inspections of each member of the group, and any additional risk-based inspections, in any case scheduled by the ICS manager and conducted by ICS inspectors
- (iii) the approval of new members in an existing group or, where appropriate, the approval of new production units or new activities of existing members upon the approval by the ICS manager on the basis of the internal inspection report;
The inspector shall verify that new farmers are included in the group only after the internal inspections are completed.
- (iv) the training of the ICS inspectors, which is to take place at least annually and to be accompanied by an assessment of the knowledge acquired by the participants;
- (v) the training of members of the group on the ICS procedures and the requirements of this Regulation.
- (vi) the control of documents and records;
- (vii) the measures in cases of non-compliance detected during the internal inspections, including their follow-up;
- (viii) the internal traceability, which shows the origin of the products delivered in the joint marketing system of the group and allows the tracing of all products of all members throughout all stages, such as production, processing, preparation or placing on the market, including estimating and cross-checking the yields of each member of the group.';
- '(h) appoint an ICS manager and one or more ICS inspectors who may be a member of the group. Their positions shall not be combined. The number of ICS inspectors shall be adequate and proportional in particular to the type, structure, size, products, activities and

output of organic production of the group. The ICS inspectors shall be competent with regard to the products and activities of the group.

The ICS manager shall:

- (i) Verify the eligibility of each member of the group regarding the criteria set out
- (ii) ensure that there is a written and signed membership agreement between each member and the group, by which the members commit themselves to:
 - comply with this Regulation,
 - participate in the ICS and comply with the ICS procedures, including the tasks and responsibilities assigned to them by the ICS manager and the obligation for records keeping,
 - permit access to production units and premises and be present during the internal inspections carried out by the ICS inspectors and official controls carried out by the competent authority or, where appropriate, the control authority or control body, make available to them all documents and records and countersign the inspection reports,
 - accept and implement the measures in cases of non-compliances in accordance with the decision of the ICS manager or the competent authority or, where appropriate, the control authority or control body, within the given time-frame,
 - immediately inform the ICS manager on suspected non-compliance;
- (iii) develop the ICS procedures and the relevant documents and records, keep them up to date and make them readily available to the ICS inspectors, and where relevant, to the members of the group;
- (iv) draw up the list of the members of the group and keep it up to date;
- (v) assign tasks and responsibilities to the ICS inspectors;
- (vi) be the liaison between the members of the group and the competent authority or, where appropriate, the control authority or control body, including requests for derogations;
- (vii) verify annually the conflict-of-interest statements of the ICS inspectors;
- (viii) schedule internal inspections and ensure their adequate implementation in accordance with the ICS manager’s schedule referred to in point (ii) of the second paragraph of point (g);
- (ix) ensure adequate trainings for the ICS inspectors and carry out an annual assessment of ICS inspectors’ competences and qualifications;
- (x) approve new members or new production units or new activities of existing members;
- (xi) decide on measures in case of non-compliance in line with the ICS measures established by documented procedures in accordance with point g and ensure the follow-up of those measures;
- (xii) decide to subcontract activities, including the subcontracting of the tasks of ICS inspectors, and sign relevant agreements or contracts.

The ICS inspector shall:

- (i) carry out internal inspections of the members of the group according to the schedule and the procedures provided by the ICS manager;
- (ii) draft internal inspection reports on the basis of a template and submit it within a reasonable time to the ICS manager;
- (iii) submit at appointment a written and signed statement on conflict of interest and update it annually;
- (iv) participate in trainings.’;

‘At least the following situations shall be considered as deficiencies in the ICS:

	<p>(a) producing, processing, preparing or placing on the market of products from suspended/withdrawn members or production units;</p> <p>(b) placing on the market of products for which the ICS manager has prohibited the use of reference to organic production in their labelling or advertising;</p> <p>(c) adding new members to the list of members or changing the activities of existing members without following the internal approval procedure;</p> <p>(d) not carrying out the annual physical on-the-spot inspection of a member of the group in a given year;</p> <p>(e) failing to indicate the members who have been suspended or withdrawn in the list of members;</p> <p>(f) serious deviations in findings between internal inspections carried out by the ICS inspectors and official controls carried out by the control authority or control body;</p> <p>(g) serious deficiencies in imposing appropriate measures or carrying out the necessary follow-up in response to non-compliance identified by the ICS inspectors or by the competent authority or, where appropriate, the control authority of the control body;</p> <p>(h) inadequate number of ICS inspectors or inadequate competences of ICS inspectors for the type, structure, size, products, activities and output of organic production of the group.'</p>
4	<p>Terms</p> <p>Internal Control System (ICS): is a tool of quality assurance, where the external certifier delegates part of his work to the organisation. The proper work of the certifier is then to evaluate the ICS' performance.</p> <p>Group: Groups can be organised on their own, but also by external entities, like e.g. processing/trading companies or mandators.</p> <p>They must have a formal structure, and, as a minimum, internal exchange of information.</p> <p>Re-inspection rate: The sample, is inspected by the external certifier, to evaluate the ICS' performance.</p>
5	<p>Policy</p> <p>5.1 Eligibility for Group Certification</p> <p>Any producer group can and should have its tools for quality assurance, independently from requirements of, or acknowledgement by external certifiers.</p> <p>In the context of group certification, however, ADITI requires that a group must fulfil the following conditions, to use an ICS as a tool for group certification:</p> <ul style="list-style-type: none"> • The group must have at least 25 members (Maximum of 2000 members as per Regulation (EU) 2018/848) • Producers must be within geographic proximity and have similar production schemes. • The group must be legally established, and structured and should conduct at least two meetings per year, where issues of organic production and marketing are discussed, among others. • Farms with land holding of 4 ha and above are inspected annually and the total area of such farms is not more than 50% of the total area of the group. • As per Regulation (EU) 2018/848): the group only be composed of members: of which the individual certification cost represents more than 2 % of each member's turnover or standard output of organic production and whose annual turnover of organic production is not more than EUR 25 000 or whose standard output of organic production is not

more than EUR 15 000 per year; or who have each holdings of maximum of 5 hectares, 0.5 hectares, in the case of greenhouses, 15 hectares, exclusively in the case of permanent grassland.

ICS can be applied for crop or livestock production, including beekeeping.

Collective farms with a centralized decision structure, where the individual farmer has no power of decision on crop management, do not need formalised ICSs.

5.2 Internal Control System:

The group must have written internal rules, which can be very brief. Rules must include the basic requirements of the respective organic standard(s) for the specific crop(s) and local conditions, but can, of course, go far beyond this.

These rules must include a catalogue of sanctions for different infringements of the rules. The group should work out sanctions, although the certifier must check, whether the infringements are adequately defined.

5.3 Internal inspectors:

The group must have a sufficient number of internal inspectors.

Internal inspectors must be adequately trained. They must have appropriate knowledge of:

- Their role as inspectors
- The essential requirements of organic farming standards
- Management techniques of the respective crop(s) or livestock
- Inspection procedures
- Sanctions established by the group
- Report writing.

Besides their knowledge, internal inspectors must have a high level of **personal integrity and reliability**.

Conflicts of interest:

In case internal inspectors are producers themselves, they should, if possible, perform inspections in other villages or subgroups, not on their own.

In case they are farm advisors, they should, if possible, not perform inspections in the same villages or subgroups where they do consulting. As a minimum requirement, consulting and control activities must be clearly separated, concerning time, budgets, etc.

5.4 Performance of internal inspections:

As a minimum, internal inspections must take place twice a year. When new groups start, or in high-risk situations, ADITI may request that more internal inspections per year take place. In high-risk situations, at least 20% of internal inspections must take place without a previous announcement.

Internal inspections are not just a matter of "filling in forms". Internal inspectors must basically perform the same control procedures as external inspectors, including double-checking of information provided by the operator.

Depending on the size and complexity of the farms, inspectors should spend sufficient time on a farm unit for inspection. For normal smallholdings with a single crop to be certified, this will be between 1 and 2 hours. For bigger, more complex or high-risk farms, a lot more time must be spent. This means that the group must have a sufficient number of internal inspectors. Big groups must be subdivided into appropriate subgroups.

Internal inspections must cover the whole operation, including plots in other places, and at least a sample of crops, which are not requested for certification.

During announced inspections, the farmer or another responsible person must be present. An inspection report must be written, containing all relevant information concerning the holding, and outlining non-conformities and corrective actions to be taken. We recommend the use of ADITI forms, but their own forms can be used if they contain equivalent information.

The report must bear a date and be signed by the producer and by the inspector. A farm map or drawing of all plots and farm buildings must be attached to the report and updated yearly.

5.5 Internal approval body:

The internal approval body can be a group of persons, e.g. the management board of the organisation. Nevertheless, in many situations, it may be more functional that only one or two persons are assigned to perform this role.

- The functions of the internal approval bodies are:
- To supervise permanently the internal inspectors.
- To evaluate the internal inspection forms, fill in the internal inspection review matrix (IIRM) and, based on this, work out the organic management plan and internal audit report for the organisation.
- To establish corrective actions and sanctions for the members.
- Pre-approval of the producers' list.

5.6 Producers' list and map:

A complete, updated and transparent list of producers is one of the most essential requirements for group certification.

As a minimum, the list must include the following information for all farmers:

- Complete name
- Complete address
- Whole farm area
- Area of crop(s) to be certified
- Potential yield
- Real yield, at least for the last year
- Dates of the first and the last internal and external inspections
- Dates of the last use of chemical inputs
- Certification status.
- Besides, it is highly recommended that the producers' list is managed as a real database, including complete information on:
 - Harvested and delivered quantities throughout the years
 - Dates of all internal and external inspections performed
 - Non-conformities, corrective actions, and their fulfilment

The group must establish privacy rules for access to this database. The information must be available for the certifier, but not necessarily for all group members.

A regional map must be provided, highlighting the locations of all farmers (or, in the case of big organisations with several subgroups, at least the location of these groups), wholesale points, storage rooms, and processing or packing units.

5.7 Parallel production:

Parallel production in the stricter sense means that the same crop is planted within the same farm on organic and conventional plots. Though NPOP and NOP do not prohibit it, in producer's groups with internal control systems, ADITI allows this form of parallel production as per the standard/scheme required for which the operator is applying certification.

Parallel production of fields with organic and transitional status within the same farm is possible for perennial crops, in case a conversion plan exists and complete separation during and after harvest is assured and supervised by the organisation.

Transitional and organic producers can be part of the organisation, even in the case of annual crops, if a complete harvest and post-harvest separation is assured.

In case the organisation includes both organic and conventional producers, the conventional producers not planning to convert to organic in the near future, the organic producers have to establish some kind of subgroup, which assures separate post-harvest handling, specific organic consulting, training, and internal control.

•**As per Regulation (EU) 2018/848:** Parallel production is not allowed. But, in the case of perennial crops which require a cultivation period of at least three years, different varieties that cannot be easily differentiated, or the same varieties, may be involved, provided that the production in question is within the context of a conversion plan, and provided that the conversion of the last part of the area related to the production in question to organic production begins as soon as possible and is completed within a maximum of five years

5.8 Conversion period:

Conversion normally starts with the first documented internal inspection – except for the cases explained in ADITI policy on the organic conversion period.

5.9 Post-harvest handling:

In many cases, the really critical points in farmer groups are not so much related to crop management, but to post-harvest handling. Risks of commingling certified and non-certified products exist on the farms (farmers, who also trade with the respective products), during transport, storage, packing, processing, etc. Farmers are often not even aware of this problem, especially in cases, where no major differences exist between crop management on certified and non-certified farms.

All post-harvest facilities have to be visited by an external inspector. Nevertheless, the organisation is responsible for assuring and supervising correct separation, documentation, and traceability at all these points. In the case of very advanced and reliable ICSs, ADITI can reduce external control of post-harvest facilities to a sample, which has to be determined by the inspector in coordination with the certification officer.

The organisation is responsible for training all members, explaining to them, how important it is, to keep certified and non-certified products separate.

Approved farmers lists must be available at all wholesale points, where farmers deliver their products. The organisation has to establish reliable mechanisms, which allow responsible at wholesale points to assess realistic quantities, which can be delivered by each producer.

From the moment, where the product leaves the farm, it has to be transported in some kind of closed container (e.g. bags or boxes) and labelled.

Transports have to be accompanied by waybills.

Farmers, who trade with the same products, for which they request certification, must be dealt with as traders. They have to keep records of purchased, stored, processed, and sold quantities. Some kind of "invoice", signed by the producer/seller of the product, has to be filed. These "trading farmers" have to be subject to annual external inspections.

"Trading farmers" are allowed to handle both certified and non-certified products only in case they have achieved a high level of professionalism, concerning separation, record keeping, labelling, and traceability.

5.10 Contracts:

The external certifier has a contract with the organisation as a whole, not with the individual producer.

Each member has to sign a contract with the organisation. As a minimum, this contract must include a commitment to fulfil organic standards (specifying the most important of them), and to give free access to internal and external inspectors to the farm, including all plots and buildings, and to the necessary information and documents.

Instead of individual contracts, group contracts are accepted. Fingerprints can be used instead of signatures in the case of illiterate members.

5.11 Re-inspection rate:

(Note: As per Regulation (EU) 2018/848 minimum of 5 % of the operators that are members of a group of operators, but not less than 10 members, shall be subject to re-inspection every year. Where the group of operators has 10 members or less, all members shall be controlled in connection with the verification of compliance referred to in Article 38(3) of Regulation (EU) 2018/848).

As per NPOP and IFOAM guidelines, we use the square root approach for establishing the re-inspection rate: as a minimum, the external certifier must inspect the square root of all members. Besides this, a "risk factor" is used to calculate the re-inspection rate:

$$y = r * \sqrt{x}$$

(x = total number of producers

y = minimum number of producers to be inspected by the certifier

r = risk factor)

The minimum number of producers to be re-inspected is 10 for Low risk, 12 for medium risk & 14 for High risk.

Risk assessment and reinspection rate

Differing from the above-mentioned guidelines, our risk factors (r) vary not only from 1 to 1.4 but from 1 to 2 as per NPOP.

The Risk assessment is based, among others, on the following criteria:

- Performance of the ICS: a good ICS means lower risk and a poor ICS high risk.
- Risk of commingling certified and non-certified products
- Risk of use of non-allowed substances, especially chemical pesticides and fertilisers
- Records: a good record system, from the level of the individual producer up to the export level, reduces risks
- Price difference between organic and conventional products: the bigger the difference, the higher the risk of fraud.
- The evaluation of the performance of internal inspectors is not only an issue of quantities but also even more of quality. To get a real insight into the work of internal inspectors, it is not enough to evaluate their reports. Therefore, ADITI will always perform witness audits of internal inspector performance during external inspections.

The following table presents examples of a high, a medium, and a low-risk situation, and the retrospective size of the sample to be re-inspected by the certifier as per IFOAM. These are just some examples. The real risk assessment and determination of re-inspection rate will be performed by ADITI inspectors, in coordination with the responsible certification officer.

Situation	Use of chemicals in the area	ICS	Risk factor	Total number of producers					
				25	50	100	200	400	500
				Number of producers to be re-inspected					
1	Common	poor	1.4	14	14	14	20	28	31
2	Uncommon	some deficiencies	1.2	12	12	12	17	24	27
3	Never	good	1	10	10	10	14	20	22

5.12 Steps to certification:

New groups applying for group certification should take the following steps towards certification:

1. Basic training of all interested members concerning organic farming principles, standards, and techniques.
2. Establishment of IQS, selection of internal approval body and internal inspectors.
3. Training of internal inspectors and internal approval body.
4. Performance of internal inspections.
5. Revision of internal reports, filling in the Internal Inspection Report Revision Spreadsheet and working out the organic management plan and internal audit report.
6. Correction of non-conformities detected during (d) and (e).
7. External inspection. As a minimum, 80% of internal inspections must have taken place, before the external inspection is performed (obviously, 100% is much better!). *
8. Eventually, corrective actions imposed by ADITI have to take place. 100% of inspections have to be completed, if this was not the case before.
9. If all relevant requirements are fulfilled, the group certificate can be issued.

* Please note, that minimum 80% refers to the inspection date. As mentioned otherwise, 100% must have been performed before the certificate can be issued.

5.13 ADITI' role in preparation of ICS and IQS:

To avoid conflicts of interest, ISO guide 65, which is the basis of our certification work, does not allow certifiers to get involved in performing consulting activities for the same clients, for whom we do certification. According to our understanding, however, this does not apply to the preparation of ICS or IQS and training of internal inspectors. Internal inspections must be conceived as part of the certifier's control activity, delegated to the group or company. Thus, training internal inspectors is considered as equivalent to training our own inspectors. If we get directly involved in preparation of ICS and internal inspector training, we can expect that things are performed according to our policies and procedures. Nevertheless, the group responsible can obviously decide, whether these tasks are performed by own their staff, by ADITI, or by external consultants.

5.14 Staff and training

ADITI strongly believes that competent staff is the key to a successful ICS. The projects should establish a competency matrix and to the maximum possible extent identify and assign competent staff from the group or outside. ADITI will require at least one training for the internal inspector (preferably the whole team) from a competent person for the internal inspectors and one external training for the whole team in 3 years. The IQS manager may attend the external trainings and train the other staff. All the new staff should receive an initial training on the IQS and internal standards. All the trainings should be documented and available for inspector.

5.15 Certification, corrective actions, and sanctions:

Group certification means that the organisation is treated as one entity. The group must be aware that this may lead to situations, where infringements by one or several producers are punished by sanctions or decertification affecting the whole group. This is especially the case, when products from different growers are mixed, making it impossible to separate the product proceeding from the growers, who do not comply with the standards.

Conditions, which must be fulfilled, before the first group certificate is issued:

- Internal inspectors have adequate knowledge
- 100% of internal inspections have been performed, documented and evaluated.
- The producers' list with complete and reliable information (see 5.6) is presented
- All producers have received at least some basic training in organic farming
- Reliable information on last use of chemical inputs is available for all producers, and allows to assign a status (conventional, transition, organic) to each of them
- The organisation has established a system, which avoids post-harvest commingling with non-certified products.

In case that different group members have a different organic status, the group must also establish a system, which assures separate purchase and post-harvest handling of these products. If this is not possible, the whole group is assigned the lowest status (e.g. 1st year of conversion, even though some members would already qualify for organic).

Besides the normal catalogue of remediation measures and sanctions, typical group measures are:

- Exclusion of members who do not comply with essential rules.
- Increase of the re-inspection rate.
- Obligation to improve training and/or supervision of producers and/or internal inspectors.

6	Access to this policy	<ul style="list-style-type: none"> • This policy is available to all interested public • It must be handed out to all ADITI certification and inspection personnel.
7	Related Documents	<ul style="list-style-type: none"> • Brief information on group certification • Organic management plan for producer groups • Internal inspection report • Internal inspection report revision spreadsheet • Inspection report for producer groups • Risk factor and re inspection rate

Revision history:

Revision date	Version	Description of Changes
11.08.2020	02	<ul style="list-style-type: none"> • Normative references are updated as per latest standards. The wordings as per standard are updated and changed in other relevant section of the policy. • Updated ADITI logo with ® mark
09.09.2022	03	<ul style="list-style-type: none"> • Added EU regulation requirements as per 2018/848. • Added revision history.
22.12.2022	04	<ul style="list-style-type: none"> • Incorporated Amendment to 2018/848 – Regulation 2021/715
31.01.2023	05	<ul style="list-style-type: none"> • Incorporated secondary acts information on group certification as per EU 2018/848
15-11-2023	06	<p>Added Clause 4.3.1.7 (vii) Inspection of grower groups as per the NPOP standard Chapter 4.</p> <p>The following section, “The requirement for approval from an external certifier for adding new members to the group after the harvest of the produce”, has been removed.</p>
01-01-2024	07	Updated the COS changes as per version 19 in the section C12, C12.2, C12.3 and C12.6
07/02/2024	08	Updated the section C 12.4.2 as per the COR OM updated as on January 2024
08/08/2024	09	Updated the policy based on the recent APEDA advisory on ICS registered office location, Display of Scope certificate and farmers list on ICS office and upload of PAN and other government ID of farmers in the Tracenet.