

<b>1</b>	<b>Aim</b>
	This policy establishes the guidelines for smallholder group certification by ADITI.
<b>2</b>	<b>Background</b>
	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.
<b>3</b>	<b>Normative framework</b>
<b>3.1</b>	<p><b>NPOP-Chapter 5-Guidelines for Certification of Grower Groups</b></p> <p><b>5.1 SCOPE</b></p> <p>Grower Group is defined in Clause 30 of Chapter 1 of NPOP: Grower Group is an organized group of farmers who produce organic products and/or engage in organic production processes in accordance with the National Standards of Organic Production and NPOP and complies with Chapter 5 of this NPOP.</p> <p><b>NPOP Procedures 2024- For Grower Groups Certification</b></p> <p>Internal Control System or ICS: acts as the control system organized by the member farmers in the Grower Group to ensure that the NPOP requirements are met by the Grower Group. The ICS of the Grower Group and an identified person shall be responsible for compliance of the Grower Group with the requirements under the NPOP and such person shall be called the ICS Manager. The ICS Manager should preferably be an existing member of the Grower Group.</p> <p><b>5.2 Requirements for Grower Groups</b></p> <ol style="list-style-type: none"> <li>The Grower Group shall be a registered legal entity in the form of, <ol style="list-style-type: none"> <li>Society registered under the Societies Registration Act, 1860 or relevant State Societies Act/Rules,</li> <li>Farmers Producer Organization (FPO)/Farmers Producer Company (FPC) incorporated under the Companies Act, 2013, as amended from time to time,</li> <li>Co-operative society.</li> </ol> </li> <li>The producers in the Grower Group must apply similar production systems.</li> <li>Land or unit, as applicable, of each member of the Grower Group shall be in geographical proximity and preferably in the same village or adjacent villages of the same district/border districts within a radius of maximum 50 Km from ICS Office.</li> <li>A Grower Group shall market its products as a single entity.</li> <li>A Grower Group shall consist of a minimum 25 and maximum of 500 farmers. Notwithstanding this, for aquaculture, the minimum group size is 10. The numbers in the Grower Group shall be reviewed from time to time by NAB based on performance and compliance of the Grower Group to the NPOP requirements and accordingly modified by NAB as deemed fit.</li> <li>Individual farms with land holding of 4 ha (10 acres) and above can also be a part of the Grower Group but will have to be inspected separately every year by the Certification Body. The total area of such farms shall be less than 50% of the total area of the group.</li> <li>Each Grower Group shall have an Internal Control System (ICS) for implementing the requirements of certification of the Grower Group under NPOP.</li> </ol>

viii. The ICS shall conduct 100% internal inspections of all farmers in the Grower Group twice a year.

**5.3 Prerequisite for farmers registered in the Grower Group under NPOP. (This requirement will be implemented after the formal operationalization of the Unique ID system by the Ministry of Agriculture & Farmers welfare)**

- i. The farmers interested in organic farming shall register themselves with the Ministry of Agriculture & Farmers Welfare (MoA&FW) through its centralized portal.
- ii. Upon farmer registration, a unique ID shall be generated.
- iii. The farmers shall provide the unique ID to the ICS of the Grower Group for registration under NPOP.
- iv. During registration under NPOP through the unique ID, the farmer information shall be validated from the centralized portal and farmers database of MoA&FW and transferred electronically to NPOP database through an Application Based Interface (API)
- v. Upon successful verification and transfer of farmer information to the “Tracenet”, the subsequent process for registration of the Grower Group shall be carried out.

**5.4 Internal Control System**

- i. Internal Control System or ICS acts as the control system organized by the member farmers in the Grower Group to ensure that the NPOP requirements are met by the Grower Group.
- ii. The ICS of the Grower Group and an identified person shall be responsible for compliance of the Grower Group with the requirement under the NPOP and such person shall be called the ICS Manager. The ICS Manager should preferably be an existing member of the Grower Group.

**5.5 Constitution, Requirements & Duties of ICS of Grower Group**

- i. The ICS of the Grower Group shall have an office at the location or in proximity of the Grower Group. Certification Body shall conduct physical verification of the office of the ICS to ensure compliance with this requirement. Before accepting any group through NOC, the Certification Body shall ensure compliance to this requirement.
- ii. ICS shall be established for functioning of the Grower Group and shall be responsible for compliance with the requirements under the NPOP.
- iii. The ICS of the Grower Group shall have a defined organizational structure, with an organizational chart, with defined roles and responsibilities for the personnel of the ICS.
- iv. The Grower Group may identify qualified and experienced personnel for functioning and maintenance of the ICS. It shall verify the credential of the personnel including previous employment.
- v. The ICS shall formulate internal standards in local language under the framework of NPOP.
- vi. The ICS shall have adequate internal inspectors for ensuring that 100% inspection of all farmers in the Grower Group is carried out twice a year
- vii. There shall be at least one internal inspector per 50-60 farmers.
- viii. The inspectors shall be well versed with the standards to perform internal inspections.
- ix. All the farmers shall maintain the farm diary for noting their activities on their farms.
- x. The farm diaries should be available for inspection with the respective farmers.
- xi. The ICS shall also be responsible for organizing required training to the farmers in production and Grower Group certification requirements.

- xii. Details of farmers, including name of the Farmer, Father's/Husband's name, the geo-location of the farm, its area, crops grown in the farm, Farmer's unique ID as given by the Ministry of Agriculture & Farmers Welfare, who are the members of Grower Group shall be displayed at the ICS office of the Grower Group.
- xiii. A manual for the ICS shall be formulated by the Grower Group comprising policy and procedure for functioning of the ICS and the Grower Group including procedures for inclusion of members in the group and exit from the group, agreement of the members with the ICS. Model format for such ICS manual is available in NPOP Procedures 2024.
- xiv. The ICS Manager shall be responsible for compliance of the Grower Group with the requirements under NPOP. Such ICS Manager shall be the contact person for the ICS and shall be resident from within the geographical limits of the Grower Group.
- xv. In case the farmers are unable to run and operate its ICS, such farmers may enter into a contract with an external service provider to act as the ICS. Such service provider shall perform all duties and responsibility of the ICS under the NPOP and all provisions applicable to an ICS under the NPOP, including sanctions, shall mutatis mutandis apply to such external service provider.
- xvi. The ICS shall have procedure and terms of reference for engagement of an external service provider (if any) with defined roles and responsibilities.
- xvii. The service provider so contracted will facilitate the maintenance of the internal control system, training, co-ordination and marketing of certified produce and certification from a Certification Body. The service provider will also ensure that all requisite documents are maintained at the ICS office.

#### **5.6 Default by members**

- If a farmer in a Grower Group defaults in following the requirements under the NPOP, the ICS shall remove such farmer from the Grower Group and ensure that the produce of such default units does not get mixed with the produce originating from the group. Moreover, the ICS manager must ensure that all the neighbouring farmers in the group take requisite contamination control measures.
- The Grower Group and its ICS shall follow the NPOP Procedures 2024 ([click here](#)) and shall maintain all the documents as prescribed in the procedures as amended from time to time.

#### **5.7 ICS Personnel**

- The Grower Group shall have designated personnel for its ICS. All personnel of the ICS shall be preferably from within the Grower Group. In case, the Grower Group engages an external service provider for running the ICS through a contractual arrangement, the internal inspectors should preferably be from within the Grower Group.
- The ICS shall have following designated personnel:  
Ref 5.7.1. Internal Control System Manager (ICS Manager), 5.7.2 Internal inspectors, 5.7.3 Approval committee, 5.7.4 Field officers, 5.7.5 Purchase officers, 5.7.6 Warehouse manager, 5.7.7Accounts/record keeper.

#### **5.8 Public information**

- The ICS of the Grower Group shall ensure disclosure of updated list of the farmers under its Grower Group, including:
  - name of farmer(s) in full, with father's/ husband's name,
  - addresses with pin code (location),
  - crop grown and/or product details, as applicable,
  - details of farm holding(s) with their location
  - organic status,
  - other details and information as may be specified from time to time, etc.

- ii. Such information shall be updated from time to time at regular intervals and shall be published at the ICS office.
- iii. The information should be readily accessible to the various Government Agencies (Central/State/Local) for the effective implementation of their schemes related to organic production and for the purpose of verification etc.
- iv. APEDA-NPOP Secretariat may seek such information from time to time based on regulatory requirements for ensuring transparency and credibility of the organic certification system.

### **5.9 Internal Standards**

The internal standards shall be prepared in local language by the ICS manager for the region of operations under the framework of NPOP standards. If the farmers are illiterate, the internal standards shall contain illustrations in the text for better understanding. The internal standards would contain:

- i. Definition of production unit.
- ii. How to deal with part conversion
- iii. Conversion period
- iv. Maintenance of buffer zone
- v. Farm production norms for the entire production unit (e.g. seeds, nutrient management, pest management, soil management, approved inputs, prevention of drifts, livestock husbandry management)
- vi. Harvest and post-harvest procedures

### **5.13 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 the estimate should be counter-checked with the estimates during external inspection by the Certification Body.

### **5.14 Procurement Process**

For procurement from the farmers in the group, the ICS has to verify the organic status, compliance of the product procured, product reconciliation etc. The ICS has to maintain purchase record and issue a signed purchase receipt to the farmer. The procured products (bags) should be labelled as organic or in conversion as per the status.

### **5.15 Storage and Handling**

- i. The purchase or the warehouse manager during the handling of produce shall check the document to ensure the compliance with the NPOP standards. The following are the minimum requirement that shall be followed during storage and handling:
  - a. Identification of the organic product at all stages of product flow during transition.
  - b. Segregation of organic products from in-conversion products.
  - c. Fumigation of containers, irradiation/ionization, etc. are prohibited.
  - d. The location in the warehouse during storage must be labelled as 'organic' or 'in-conversion'.

### **5.16 TRAINING OF ICS PERSONNEL**

- i. The ICS shall ensure that each internal inspector is trained annually by an external person/agency well versed in the NPOP requirements and organic processes.

ii. The date of the training, course content, list of participants and photographs will be documented.

#### **5.17 TRAINING OF FARMERS**

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

- i. Each farmer needs to receive at least one initial advisory visit and training on organic farming and group certification requirements.
- ii. Besides, farmers should receive one regular training annually from central and state agencies responsible for promotion of organic farming.
- iii. The date of training, course content and list of participants with photographs, videos to be documented.
- iv. The training session should be in simple and local language. Training videos and pictorial graphics should also be used for better understanding.

#### **5.18 External inspections by Certification Bodies**

- i. The Certification Bodies shall undertake inspections of the ICS after ensuring that 100% internal inspections by the ICS have been undertaken at least twice in a calendar year/scope cycle for all the registered members of the Grower Group.
- ii. The Certification Body will inspect some of the farms for the evaluation of the Grower Group for efficient internal control system for compliance with the NPOP Standards.
- iii. The Certification Body shall inspect farms of 4 Hectare and above separately in addition to the sample of farms having the area of less than 4 Hectare.

##### **5.18.1 Sampling Plan**

- i. The sampling plan for inspection shall be based on the following factors to be taken into account for risk assessment:
  - a. Size of holding
  - b. Number of the members in the group
  - c. Degree of similarity between the production system and crop system
  - d. Co-mingling
  - e. Contamination
  - e Parallel production
  - f. Split production
  - g. Local hazards
  - h. Change in the production plan
  - i. Joining of new members in the group.
  - k. Past certification history and sanctions

##### **5.18.2 Risk Assessment**

- (i) A minimum sample size of the members in the Grower Group shall be inspected by the Certification Body.
- (ii) The Certification Body shall establish criteria for assessment of risk under high, medium and low categories.
- (iii) Based on the risk assessment made by the Certification Body prior to the inspection visit, the number of sample inspections shall be planned.
- (iv) The sample size shall be determined as below:
  - a. High risk: 2 X square root of number of farmers
  - b. Medium risk: 1.5 X square root of number of farmers
  - c. Low risk: square root of number of farmers (min 20 farmers)
- (v) A min of 20 farmers shall be inspected during external inspections.

- (vi) The sampling plan should be such that all the farmers are covered in the external inspection in due course and the same farmer is not repeated except in case of verification/suspicious of noncompliance is there.
- (vii) The risk assessed by the Certification Body shall be documented.

### **5.18.3 External Inspection:**

- (i) The Certification Body shall conduct the external inspection as per the requirements specified in this Chapter, inspection, and certification requirements as per Chapter 4 and production standards as per Chapter 3 of the NPOP. The Grower Group shall be provided a maximum of 30 days' time to address the non-compliances observed by the Certification Body during external inspection.
- (ii) Certification Body shall impose sanctions on the Grower Group based on non-conformity during inspections/investigations etc. as per their sanction catalogue.
- (iii) Sanctions should be dissuasive and should be applied to entire Grower Group when inspections, based on the representative sample of farmers, indicate serious non-compliances affecting the integrity of organic process. In the event, it is found that the Grower Group is not compliant with the NPOP in so far as it is affecting the integrity of the organic production, the transaction certificate of the Grower Group shall be immediately cancelled by the Certification Body.
- (iv) A list of all Grower Groups that have been sanctioned under the NPOP shall be published on the website of the Certification Body.

### **5.18.4 Non-Compliances by members of Grower Group and Sanctions imposed by ICS:**

5.18.4.1: In case of non-compliance with applicable provisions of the NPOP, the ICS shall have power to impose sanctions on its members and take corrective or mitigating measures. For this purpose, ICS may refer to the model procedures formulated in this respect by the NPOP Secretariat, for adoption.

5.18.4.2: If required, a minimal pecuniary penalty, (up to Rs. 5000/-) may be imposed on farmers for violations of NPOP requirements. The acreage of the farm holdings of the concerned farmer shall be taken into consideration while imposing the pecuniary penalty. However, this amount may be adjusted by the ICS in case of full compliance during the sanction period.

5.18.4.3: Sanctions imposed shall be documented (list of farmers issued sanctions, documentation of identified non-conformities in the files).

5.18.4.4: Farmers who have used prohibited inputs on their farms must undergo the full conversion period (if they remain in the Grower group). In such cases, it is required to be verified whether such farmers have already delivered produce and whether such "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 to be removed from the supply chain.

## **Chapter 4: Accreditation Of Certification Bodies**

### **4.4.1.3 Analysis and Residue Testing**

- iii. The Certification Body shall take and analyse samples for detecting presence of unauthorized substances in the organic processes. The number of samples to be taken and analysed by the Certification Body every year shall be at least 5% of the total number of Operators under its control. Additionally, samples from minimum 2% farmers of each Grower Group shall also be analysed for detecting presence of unauthorized substances in the organic process.

<b>Policy on Group Certification and Internal Control System (ICS)</b>		Doc No.: Pol. 4.1.3
Rev. No.: 12	Rev. Date: 26/09/2025	Page 7 of 24

iv. The Certification Body shall bear the cost of analysis and residue testing for the mandatory 5% testing required under the regulation

#### **NPOP Procedures 2024- For Grower Groups Certification**

##### **4. Documents and records of the Grower group**

j) ICS of the Grower group will maintain the following documents/records:

- a) Registration details for legal entity,
- b) Date of registration,
- c) Organizational structure,
- d) Complete details of the members of the Grower Group, including name of the Farmer, Father's/Husband's name, geo-location of the farm, its area, date of joining the Grower Group, land details (organic, in conversion, non-organic), Farmer's unique ID as given by the MoA&FW, crops grown in the farm, conversion status, yield estimates, details of collection centres, purchase centres, storage area, previous certification details etc.
- e) Application forms of the farmers,
- f) Contract with the respective farmers,
- g) Exit forms covering reasons for exit,
- h) Updated list of farmers with date of last update,
- i) Location map of the Grower Group depicting the location of the production area/farms,
- j) ICS Manual covering detailed operating procedures,
- k) Internal standards in local language under the framework of NPOP and package of practices,
- l) Contract with Service Provider (if applicable),
- m) Farm diaries (available with the respective farmers),
- n) Internal inspection records, formats of checklist and report with date and version,
- o) Date of internal inspections (start and end date),
- p) Internal inspection checklist and reports with name of internal inspectors, date etc.,
- q) Findings of internal inspections,
- r) Report of External inspection conducted by the Certification Body,
- s) Training records comprising of training schedule, dates of training, list of participants, attendance sheet, course content, training module including pictorial graphics, training videos, trainer, photographs, video etc.,
- t) Sanction Catalogue,
- u) List of sanctions imposed in case of non-compliance by farmers.

##### **5. Registration of members**

- i. The farmers desirous of becoming a member of the Grower Group shall make an application to its ICS. The application format is at Annex 1.
- ii. The ICS manager will review the application and suitability in terms of location, farming practices, crops etc.
- iii. Upon acceptance of the application, the ICS shall register the members as a group under a single legal entity,
- iv. The grower group members will submit their complete details including name, address (location, land details, area, crops grown, conversion status, yield estimates, storage area, previous certification details etc. (with identity proof).
- v. The ICS shall enter into a contract with the farmers. The format of farmers contract with ICS is at Annex 2.

vi. The ICS while accepting new members in the grower group including members from other ICS shall inform the accredited Certification Body promptly.

#### **8. Critical control points for risk assessment:**

The following shall be considered as critical control points for risk assessment:

- i. Measures taken by the farmers to deal with part conversion (if farmers still grow some non-organic crops).
- ii. Conversion period
- iii. Production rules for the whole production unit, e.g., seeds, fertilization and soil management, pest management, approved inputs, prevention of drifts, animal husbandry.
- iv. Harvest and post-harvest procedures.
- v. Procurement and handling procedures

#### **9. Internal Inspections:**

- i. At least two inspections of the group (one in growing season of each crop) in the calendar year/scope cycle shall be carried out by the internal inspector and will be documented.
- ii. The inspection will be carried out in the presence of the member or his authorized representative and must include a visit of the whole farm, storage of inputs, harvested products, post-harvest handling and animal husbandry.
- iii. The internal inspector will also verify if the internal standards have been followed and whether the conditions of the previous internal inspection have been fulfilled.
- iv. The visit of the internal inspector will be documented in the farm inspection checklist duly signed by the inspector and counter-signed by the member or his representative. The format for internal inspection checklist is at Annex 6.
- v. In case of serious non-conformity, the results will be reported immediately to the ICS manager and all measures will be taken according to the internal sanction procedures prescribed herein at Model ICS Manual in Model Documents

#### **10. Internal Approvals:**

- (i) The ICS will have a defined procedure for approval or imposition of sanctions on the farmers in the Grower Group. All internal farm checklists shall be reviewed by the approval manager /committee with special focus on the critical control points of risk/difficult cases.
- (ii) 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.
- (iii) Based on the recommendation of the approval manager/committee, sanctions (as per sanction catalogue (prescribed as per the ICS Manual) will be imposed on the members for the non-compliances reported in the internal inspection. The format for sanctions by ICS is at Annex 8.

#### **11. BUYING PROCEDURES**

The ICS will follow the following minimum requirements while procuring the produce from the farmers:

- i. The status of the farmer in the group from whom the produce is being procured should be checked.

- ii. The supplied amount should be compared with the harvested amount and estimated yield. In case of doubt, the product is kept separately until clarified by the ICS manager.
- iii. The delivered quantity of the product will be registered in the purchase record.
- iv. A duly signed receipt shall be issued to each farmer upon procurement of his produce by the purchase officer stating the quantities of the product delivered with the date.
- v. All documents shall indicate the status of the certified product (organic or in conversion).
- vi. All bags containing organic certified products must be clearly labelled as 'organic' or as 'in-conversion'.

## 12. Storage And Handling Procedures

The purchase or the warehouse manager during the handling of produce shall check the document to ensure the compliance with the NPOP standards. The following are the minimum requirement that shall be followed during storage and handling:

- (i) Identification of the product at all stages of product flow during transition.
- (ii) Segregation of organic products from in-conversion products.
- (iii) The location in the warehouse during storage must be labelled as 'organic' or 'in conversion'.
- (iv) Fumigation of containers, irradiation/ionization, etc. are prohibited.

## 13. Procedure for Change of Service Provider

- i. The service provider is an external body (e.g., Self-Help Groups / NGOs / Private Agency /Govt. Agency cooperative society) that may be engaged by Grower Groups, if required, for a specified period of time, on payment of mutually agreed service charges and who shall perform all duties and responsibility of the Internal Control System(ICS) of the grower group, under the NPOP and all provisions applicable to a grower group under the NPOP, including sanctions, shall *mutatis mutandis* apply to such service provider.
- ii. In cases wherein a grower group wants to change its service provider, or the Service provider does not want to run the ICS of the group, such an engagement can be terminated by either party, by giving one month's notice to the other party, under intimation to its Certification body. In case of grower groups, written representation by at least 50% or more of its members will be treated as a valid notice
- iii. The Certification body shall ensure that dues, if any, attributable either to the Grower group or to the Service provider shall be remitted to the concerned party, during the notice period.
- iv. Two (2) weeks after the completion of the notice period (counted from the date of its receipt by the Certification Body), the Certification Body shall block the access of the existing ICS Manager/Service provider to the grower group account.
- v. If either party is not satisfied by the decision of the Certification body, which for clarity is limited to the issue of settlement of dues between the parties, then the party/parties within a period of two weeks of completion of the notice period of one month, may approach APEDA for decision on the matter.
- vi. APEDA shall place such case to the sub-committee constituted by the NAB for this purpose, for final decision.
- vii. The Certification Body shall then block the access of the existing ICS Manager/Service provider to the grower group account.

	<p>viii. The grower group will identify another Service provider or designate a person from within the group to act as the service provider. The representative of the group for ICS Manager should be selected by the members by more than 50% majority.</p> <p>ix. The same shall be intimated to the certification body who shall update the contact details and provide the login credentials to the new ICS Manager.</p> <p>x. In case of a new service provider, the grower group will provide the new contract. The Certification body shall update the new contract and details of the new service provider.</p> <p>Annex 1-8 on NPOP <b>Procedures 2024- For Grower Groups Certification</b> details on specimen formats to be incorporated into the ICS.</p>
<b>3.2</b>	<p><b>The US National Organic Standard (NOP) (§205.101)</b> 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>
<b>3.3</b>	<p><b>COS: COR OM</b></p> <p><b>C.12 Requirements for grower group certification under COR</b></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>C.12.1.5 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> <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</p>

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:

	<ul style="list-style-type: none"> <li>• results from internal control system inspection</li> <li>• complaint files</li> <li>• significant variations in the sites' size</li> <li>• modifications since the last certification</li> </ul> <p>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.</p> <p>C.12.4.5 The CB shall ensure that the grower group has established procedures for adding new members to the grower group.</p> <p><b>C.12.6 Certification documents</b></p> <p>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.</p>
<b>3.4</b>	<p><b>EU Regulation 2018/848, Regulation (EU) 2021/279, EU 2021/715 :</b></p> <p><b>EU 2018/848, Group of operators (Article 36):</b></p> <p>1. Each group of operators shall:</p> <p>(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.</p> <p>(b) only be composed of members:</p> <p>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</p> <p>(ii) who have each holding of maximum:</p> <ul style="list-style-type: none"> <li>— five hectares,</li> <li>— 0,5 hectares, in the case of greenhouses, or</li> <li>— 15 hectares, exclusively in the case of permanent grassland.</li> </ul> <p>(d) have legal personality.</p> <p>(e) only be composed of members whose production activities take place in geographical proximity to each other.</p> <p>(f) set up a joint marketing system for the products produced by the group; and</p>

(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:

	<ul style="list-style-type: none"> <li>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.</li> <li>b. Documentation of identified non-compliance.</li> <li>c. Documentation of follow-up of the measures.</li> </ul> <p><b>g)</b> traceability records, including information on the quantities, of the following activities, where relevant:</p> <ul style="list-style-type: none"> <li>a. Purchase and distribution of farm inputs including plant reproductive material by the group.</li> <li>b. Production including harvest.</li> <li>c. Storing</li> <li>d. Preparation.</li> <li>e. Delivery of products from each member to the joint marketing system.</li> <li>f. Placing on the market of products by the group of operators.</li> </ul> <p><b>h)</b> The written agreements and contracts between the group of operators and subcontractors include information on the nature of the subcontracted activities.</p> <p><b>i)</b> The appointment of the ICS manager.</p> <p><b>j)</b> The appointment of the ICS inspectors as well as the list of ICS inspectors</p> <p>• <b>Minimum percentages of controls and sampling: (Article 7 of 2021/279):</b></p> <ul style="list-style-type: none"> <li><b>a)</b> 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.</li> <li><b>b)</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.</li> </ul> <p><b>Regulation (EU) 2021/715: (Amendment to EU 2018/848):</b></p> <p><b>The system for internal controls (ICS) shall comprise documented procedures on:</b></p> <ul style="list-style-type: none"> <li>(i) the registration of the members of the group;</li> <li>(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</li> <li>(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.</li> <li>(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;</li> <li>(v) the training of members of the group on the ICS procedures and the requirements of this Regulation.</li> <li>(vi) the control of documents and records;</li> <li>(vii) the measures in cases of non-compliance detected during the internal inspections, including their follow-up;</li> <li>(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</li> </ul>
--	---

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:**

	<p>(i) carry out internal inspections of the members of the group according to the schedule and the procedures provided by the ICS manager;</p> <p>(ii) draft internal inspection reports on the basis of a template and submit it within a reasonable time to the ICS manager;</p> <p>(iii) submit at appointment a written and signed statement on conflict of interest and update it annually;</p> <p>(iv) participate in trainings.’;</p> <p><b>‘At least the following situations shall be considered as deficiencies in the ICS:</b></p> <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>
<b>4</b>	<b>Terms</b>
	<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. Re-inspection rate: The sample, is inspected by the external certifier, to evaluate the ICS' performance.</p>
<b>5</b>	<b>Policy</b>
	<p><b>5.1 Eligibility for Group Certification</b></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"> <li>• The group must be a registered legal entity (e.g., Society, FPO/FPC, Co-operative society) and formally established with central management and defined decision procedures.</li> <li>• ICS can be applied for crop, livestock, or beekeeping production</li> </ul>

<b>Policy on Group Certification and Internal Control System (ICS)</b>		Doc No.: Pol. 4.1.3
Rev. No.: 12	Rev. Date: 26/09/2025	Page 18 of 24

- The group must have at least 25 members to maximum of 500 farmers for NPOP. Maximum of 2000 members as per COS and Regulation (EU) 2018/848.
- The farmers interested in organic farming shall register themselves with the Ministry of Agriculture & Farmers Welfare (MoA&FW) through its centralized portal and obtain a unique ID.
- Producers must be within geographic proximity (preferably same/adjacent villages within 50 Km radius from ICS Office for NPOP, or generally close for COR/EU) and have similar production schemes.
- A Grower Group shall **market its products as a single entity** and operate a **joint marketing system**. Members should market their organic production *only* through the grower group and register to only one group for a given product as per NPOP, COS Regulation (EU) 2018/848.
- ICS should conduct at least two meetings per year, where issues of organic production, outcomes of the internal inspections, 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.

### 5.2 Internal Control System:

The ICS acts as the control system organized by the member farmers within the Grower Group to ensure compliance with organic standards like NPOP. It is a quality assurance tool where the external certifier delegates part of its work to the organization.

The group shall maintain a written ICS manual outlining the policy, procedures, and organizational structure for ICS and Grower Group operations, including member inclusion and exit. It must cover the basic requirements of applicable organic standards and local crop conditions. A defined sanction catalogue for rule violations must be included, subject to review by the certifier for adequacy.

### 5.3 Internal inspectors:

The group must have a sufficient number of internal inspectors (at least one per 50-60 farmers) preferably from within the group. Internal inspectors must be adequately trained annually by an external person/agency well-versed in NPOP requirements and organic processes. 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.
- Importance of no conflict of interest

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

### **Conflicts of interest:**

Internal inspectors must operate independently and maintain objectivity. Inspectors who are also producers shall not inspect their own farms, those of immediate family members, or within their own subgroups or villages. Similarly, if inspectors are also farm advisors, they must avoid conducting inspections in areas where they provide consultancy services. At a minimum, there must be a clear separation between advisory and inspection roles in terms of time, responsibilities, and budget allocation. All potential conflicts must be declared and managed appropriately.

### **5.4 Performance of internal inspections:**

- Frequency: 100% internal inspections of all farmers in the Grower Group must be conducted twice a year (or at least two inspections per calendar year/scope cycle, with one in the growing season of each crop for NPOP). COR requires at least one annual on-site inspection visit to each individual member
- Scope: Inspections must cover the whole farm operation, including visits to fields, storage of inputs, harvested products, post-harvest handling, and animal husbandry, as well as a sample of non-certified crops.
- Procedure: 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 available information. They should spend sufficient time on each farm unit (e.g., 1-2 hours for smallholdings).
- **Documentation:** An inspection report/checklist must be written by the internal inspector, containing all relevant information, outlining non-conformities, and specifying corrective actions. The report must be dated and signed by both the farmer and the inspector. 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:**

An Approval Committee comprising three members from within the Grower Group, knowledgeable in ICS, internal standards, and NPOP, shall be formed<sup>48</sup>. A service provider may participate as a non-voting technical support member, but final decision-making authority rests solely with the three designated Grower Group members. The functions of the internal approval bodies are:

- To supervise the internal inspectors.
- To evaluate the internal inspection forms, focusing on critical control points and difficult cases.
- 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/ICS overview map must be provided, highlighting the locations of all farmers (or, sub-groups)-procurement points, wholesale points, and storage rooms, etc.

### **5.7 Parallel production:**

Parallel production refers to the simultaneous production, processing, or handling of visually indistinguishable crops or products using both organic and non-organic systems. The approach to parallel production differs between NPOP and EU regulations.

5.7.1 As per NPOP: parallel production is permitted, but it is subject to stringent control measures to maintain the integrity of organic products and prevent co-mingling and contamination.

For operators engaging in parallel production, the NPOP requires:

- Preventative Measures:** Management practices and physical barriers must be established to prevent co-mingling and contamination between organic and conventional production units.
- Clear Identification and Segregation:** Organic, in-conversion, and conventional products must be clearly identifiable at all stages of handling and storage. Organic products must be protected from co-mingling with non-organic products and from contact with prohibited substances.
- Transport:** Simultaneous collection and transport of organic, in-conversion, and conventional products is allowed only if strict separation measures are implemented to prevent contamination or co-mingling
- Certification Body (CB) Oversight:** If a farm is engaged in parallel production, ADITI personnel must verify:
  - Buffer Zones are maintained for demarcation
  - Crops are visually distinguishable
  - Inspections are carried out at critical stages of the crop cycle in a timely manner
  - Testing conducted when there is a risk of cross-contamination. Samples for analysis and testing should be drawn from buffer zones if a contamination risk is determined
  - Accurate production estimates are available for both organic, in-conversion & conventional production systems
  - Reliable harvesting methods are in place to verify the actual harvest of respective crops
  - Appropriate separate storage capacity exists for different product statuses

- Well-managed documentation that clearly distinguishes between certified and non-certified production

**5.7.2 As per Regulation (EU) 2018/848:** Parallel production is not allowed. However, there is a specific exception for certain perennial crops that require a cultivation period of at least three years, different varieties that cannot be easily differentiated, or even the same varieties, may be involved in parallel production provided that:

- The production is within the context of a conversion plan
- Complete separation during and after harvest is assured and supervised by the organization
- 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 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 must 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:**

The re-inspection rate in organic production refers to the frequency and methodology by which CBs conduct external inspections of certified operators, particularly within grower groups, to ensure integrity and credibility of organic products in compliance with organic standards. The square root approach in consideration of the 'risk factor' for establishing the re-inspection rate. The formula for the calculation is explained in the relevant normative reference section.

The Risk assessment is based on the requirements of each applicable standard.

#### **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 ICS, 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
7. External inspection- 100% of internal inspections must have taken place, before the external inspection is performed.
8. If all relevant requirements are fulfilled, the group certificate can be issued.

#### **5.13 ADITI' role in preparation of ICS:**

To maintain impartiality and avoid any conflict of interest, ADITI, as a certification body operating in accordance with ISO/IEC 17065, does not engage in consulting activities for clients under certification. This includes direct involvement in the preparation of Internal Control System (ICS). However, ADITI may provide general guidance and training sessions for internal inspectors and group staff, focusing on the interpretation of organic standards, certification procedures, and inspection protocols. Such training is intended to ensure that internal inspections are conducted in a manner consistent with the requirements of NPOP and ADITI's certification system.

The responsibility for developing and implementing the ICS remains entirely with the operator or grower group. They may choose to carry out these tasks using their own staff or engage qualified external consultants/service providers, provided the certification body maintains its independence from any such consulting role.

#### 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 requires that all internal inspectors and ICS Manager undergo at least 1 external training conducted by a qualified and competent resource person or agency, preferably covering the entire internal inspection team. All the new staff should receive an initial training on the ICS and internal standards. All the trainings should be documented including the trainer's credentials, training agenda, participant list, date, and location. These records shall be made available to ADITI inspectors and certification personnel during evaluations and audits.

#### 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 5.8) 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. 1<sup>st</sup> 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.
- If required, a minimal pecuniary penalty, (up to Rs. 5000/-) may be imposed on farmers for violations of NPOP requirements.

6	<b>Access to this policy</b>	• This policy is available to all interested public
---	------------------------------	---

		<ul style="list-style-type: none"> <li>It must be handed out to all ADITI certification and inspection personnel.</li> </ul>
7	<b>Related Documents</b>	<ul style="list-style-type: none"> <li>INF 3.2.5_Brief information on group certification</li> <li>F 4.3.5_Organic management plan for producer groups</li> <li>F 4.3.5.1_Internal inspection report</li> <li>F 4.5.5.1_Internal inspection report revision spreadsheet</li> <li>F 4.5.1_Inspection report for producer groups</li> <li>F 4.5.5.2A_Risk factor and re inspection rate</li> </ul>

#### Revision history:

Revision date	Version	Description of Changes
11.08.2020	02	<ul style="list-style-type: none"> <li>Normative references are updated as per latest standards. The wordings as per standard are updated and changed in other relevant section of the policy.</li> <li>Updated ADITI logo with ® mark</li> </ul>
09.09.2022	03	<ul style="list-style-type: none"> <li>Added EU regulation requirements as per 2018/848.</li> <li>Added revision history.</li> </ul>
22.12.2022	04	<ul style="list-style-type: none"> <li>Incorporated Amendment to 2018/848 – Regulation 2021/715</li> </ul>
31.01.2023	05	<ul style="list-style-type: none"> <li>Incorporated secondary acts information on group certification as per EU 2018/848</li> </ul>
15-11-2023	06	Added Clause 4.3.1.7 (vii) Inspection of grower groups as per the NPOP standard Chapter 4. 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.
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.
16/10/2024	10	Updated internal inspection requirement and Re-inspection rate based on NPOP requirements.
27/06/2025	11	Updated as per NPOP 8 <sup>th</sup> Edition & NPOP Procedures For Grower Groups Certification
26/09/2025	12	Updated the COR OM - C.12.1.10 under Section 5.1, points 3 & 6