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CERTIFICATION of "GROWER GROUPS INTERNATIONAL"

Relevant regulations of organic production projects allow certification of "Grower groups." This certification is based on the conformity of an organic system plan with the regulations in force. The evaluation of the internal control system for the certification of "grouwer groups" is possible if sufficient guarantees are made; this may reduce the need for direct observation by the external control unit or each sub-group of the producer.

When groups or individuals applying for organic certification of their projects to Certisys, they must submit an organic system plan, that is to say a detailed description of the activity of production or preparation (processing, marketing) to which they subscribe.



1. Definitions of terms:

For the purposes of this document, certain concepts and terms are defined here to the understanding of users:

1.1 "Organic production": This is a regulated and certified agricultural production system that is based on respect for the living and the natural cycles, which manages globally the production by promoting agro-ecosystem but also biodiversity, biological activities soil and biological cycles. The regulation prohibits the use of fertilizers, synthetic pesticides and genetically modified organisms (GMOs) in organic production. Farmers who wish to be certified in this mode of production rely, for example, on crop rotation, green manure, compost, biological pest control, use of natural products, and mechanical cultivation to maintain soil productivity and control of diseases and pests.

The production of products with the "organic" label implies control of the entire production chain from cultivation or harvesting of raw materials to export or consumption.

1.2 "Plan of Biological System" (PSB) (for NOP) is a management plan between the producer or preparer and the certifying body that includes descriptions of all aspects of agricultural production or preparation. This plan must be established, amended and validated through a dialogue between the certifying body and the producer or preparer, it must be adapted to the particularities of each project.

The organic system plan is the framework of exchange by which the producer or preparer and the certifying body work together to define, on the basis of a given site or project, how to ensure product quality and document activity accordance with the regulations in force. It commits the producer or preparer to practice procedures enabling it to comply with each applicable provision in the regulations.

The PSB is the key document management certified project. The certification body is competent to determine the necessary documentation required to review and assess the level of the biological system of a project. This file must be adapted to the specific activities and be sufficient to demonstrate compliance with organic production. To this end, the certifying body may request additional documents to ensure that a particular project is consistent.

1.3 "Operator": Any legal entity (cooperative, association, GIE NGOs, natural or legal persons) responsible for ensuring compliance with the requirements of the regulations within the organic business under their control.

1.4 "Preparation": This is of any intervention on products outside the firm (place of production)

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for storing, cleaning, sorting, conditioning or turn a raw agricultural product into a finished food product or semi-finished (drying, skinning, food preparation).

1.5 "unit of production": This is the place where the products originate and / or prepared, including all sub-units located in geographic proximity. A production unit may be composed of several sub-units in the same geographical proximity, works in the plane of the biological system, and is managed by an internal control system that ensures compliance with the applicable provisions of the regulations. Each production unit as part of a production or a biological preparation defines its site, its practices, its management and its products.

1.6 "Sub-Unit": This is the smallest divisible part of a production unit such as a field, a plot, a wild collection area, or a separate processing sector. For example, if the village is a production unit, the producer members of the group in the village are the subunits.

1.7 "Site": This is the place of production and management activities of a unit.

1.8 "Installation": Any development or common equipment to units of "producer group" set up for storing, cleaning, sorting, packaging or processing of products (shop, cleaning materials factory , etc.).

1.9 "Internal Control System" (ICS): This is the quality assurance system sets internally included in the organic system plan, which defines the practices, record keeping and internal control requirements applicable to each production unit, site or facility. It identifies the internal control method.

1.10 "Conversion" means the transition from non organic to organic farming within a given period, during which the provisions concerning the organic production method are applied.

2. Guide for Certification of "grower groups".

The producers working together certification method is traditionally called "group certification" and hereinafter as "the producer group certification". When the project activities are carried out in a similar manner at different sites, production units and installations, and where these activities are governed by a plan of the biological system (PSB) performed well, the inspection may be carried out after risk assessment by sampling rather than by direct observation of each member of the producer group.

2.1 Requirements for certification of "grower groups"

The "grower group" consisting of production units, sites, and facilities must be formally organized (association, cooperative society, GIE, individual, or other entity). Certification is established in the name of the group and not the individual members, besides they can present themselves as certified that through their group. The operator here referred to as "grower groups" can be certified by an accredited and authorized certification body for the certification project "grower groups". The practice of "producer group" shall be uniform and reflect a process or a consistent methodology, using the same inputs and procedures.

Participation in the Certified Project is limited to members which must sell their certified organic production only through the group, unless the members are certified individually. Producer members of the group must use the same procedures and techniques of production, processing, distribution and marketing while not losing sight of the traceability of their products to the final destination (encoding, labeling, marking, etc.) .

keeping protocols records and archives should comply. It is not acceptable that the production units of "groer group" differ in their methodology for data recording.

2.2 Project "grower group" in the organic system

The "grower group" shall establish and implement an internal control system (ICS) with control and documentation of production practices, inputs used in each sub-unit, production unit, site or facility to ensure compliance products of organic production.

Admission Criteria "members" in a production unit:

The appointment of members as belonging to one production unit on a given geographic location and type of product.

All members in a production unit:

- individually undertake to respect the conditions of production of organic farming;
- receive the same training provided by the group and monitoring;
- apply the same production practices and recording;
- the input supply is controlled by the group;
- share a responsibility for the management of activities, extension, monitoring and strengthening the functioning of the internal control system;
- use consistent and identical methods of preparation;
- are located in the same geographical proximity, defined by access to the same system of collection or post-harvest processing, and / or common land, the source of water supply, the same topography and other physical factors;
- the same products and share the harvest program.

Similarly, if a member of a production unit transforms the products of more than one producer member, it must be considered as a separate production unit, and must be inspected annually by the certification body. The maximum number of producer members of a given production unit should be based on the feasibility of an effective supervision of SCI and factors such as the size of the subunits and accessibility.

2.3 Inspection of the "grower group"

The inspection or external audit by the certification body is "the field evaluation of the production project or preparing an applicant for certification to determine compliance with the organic production method as described in PSB ".

The annual external inspections are important because they allow to determine whether a PSB is properly implemented. The checks consist among others to verify the compliance of the PSB, control inputs, storage places, measures separations between conventional and organic plots and, recipes and preparation procedures, packaging materials and labeling, hygiene measures for the processing part. The description should be consistent, both for acreage, the origin of inputs and technical route, as administrative records and traceability.

Verification of the PSB is largely accomplished by an audit of the internal control system, along with a physical examination of each production unit (typically the headquarters or common services processing or collection) and a meaningful sampling of subunits in any given production unit. In subsequent years, all successfully controlled units will be inspected by the sampling method described below). In the "grower group", the production of subunit is the smallest portion to be inspected each year. In addition to the mandatory annual inspection, unannounced inspections may be organized by the certifying body. Note NOP certification for all production unit must be inspected the first group of the certification year. The plots of a new member will follow a conversion time prior to certification as organic. This time varies from 0 to 3 years following products and sites. For example, the wasteland cultivation under certain conditions to determine Certisys requires no conversion time.

2.3.1 Inspection: Risk Evaluation and sampling

2.3.1.1 Risk Assessment: The objective of risk assessment is to determine whether the internal control system (ICS) is working properly and to detect and correct non-conformities in time before they jeopardize certification group.

Certisys determined according to procedures which subunits in a production unit must receive an external inspection in addition to the mandatory inspection of new production units, depending on the risks of non-compliance.

The higher the overall level of risk, the greater the sample size is large to control. The following parameters allow inspectors to determine the sample size and decide which units and sub-units should be inspected annually:

the number of units and sub-units of production facilities and sites of the members of "Producer";

the average size of the production unit and subunits;

the degree of uniformity between the subunits within a production unit;

the complexity of the production system;

the internal control structure;

non-conformités saved in a sub-unit in the previous year;

newcomers in the "Producer";

the significant extension of the size of the subunit;

neighboring crops;

the number of years that the "producer group" worked;

all previous problems in the functioning of the ICS;

staff movements;

potential conflicts of interest;

the complexity of the types of subunits and / or marketed products;

the predominance of conventional production of the same type in the region;

if it is a preparation or other intervention is included;

compliance practices with respect to internal training;

the frequency of minor nonconformities same.

2.3.1.2 Sampling: The number of members of a grower subject to a physical external control can not be less than 10. For a normal risk of situation, the sample may be below the square root of number members of the grower group. In medium or high risk of situations, Certisys defines a risk factor of at least 1.2 and 1.4 respectively. The number of inspection to achieve each year, at least 25% of the subunits should be selected at random.

Minimum number of small holdings to the Ext annual physical control performed by Certisys			
Nombre de membres (=n)	Risque normal facteur = 1	Risque médium facteur = 1,2	Risque élevé facteur = 1,4
< ou égale à 100	10	12	14
> 100	$\sqrt{n}$	$1,2\sqrt{n}$	$1,4\sqrt{n}$

In case Certisys notes a serious lack of reliability and efficiency of Internal Control System, the number of members of groups subject to supervision annual external must be increased to at least three times the square root of the number of Members of producer groups ($3\sqrt{n}$).

2.3.2 The role of the internal control system (ICS)

The internal control system aims to ensure compliance practices with the rules of organic production. All members of a "grower group" are governed by the same PSB and the SCI should ensure adequate supervision to ensure that all participants uniformly ensure the proper implementation of the plan. It is in the interest of the ICS staff to safeguard the biological status of the group in its entirety.

In a production unit, internal auditors are responsible for monitoring the practices of members (all plots, all sites and all facilities) at least once a year minimum. Control of a subunit of the "grower group" must focus on critical areas of biological behavior as neighboring crops, crop conditions, soil quality indicators, inputs, storage facilities and the level of understanding of biological requirements by producers.

While it is the role of the inspection body to ensure that the SCI working properly at the production units, sites, and facilities, the internal control system in turn, more in-depth analysis each of these units, sites or production facilities. All non-conformities in the production unit, site or facility must be reported to Certisys (and not only in SCI).

2.3.2.1 How SCI works

Internal auditors perform at least one complete annual inspection of each producer, including visits to fields and / or facilities. The internal control system keeps appropriate documentation including at least a description of the subunits and facilities, production plans, the products harvested, the contract producer and reporting internal controls.

The internal control system must include the application of sanctions to individual members who do not conform to the PSB group. He must inform the certification body of the irregularities and non-compliances detected very minor. He must also communicate to members of the group concerned and the corrective actions imposed their turnaround times.

The SCI must provide grid applicables sanctions on members of the group that are not in accordance with the mode of production. It should provide for additional inspections to verify implementation of corrective actions. It must also provide for the suspension or expulsion of members or subunits that are in non-compliances, including corrective measures to be implemented by the member or unit before being readmitted. He must inform the certification body of any corrective actions; a member who deliberately and fraudulently violating the regulation should not be allowed to join the group until the certification body approves the measures taken to ensure that the violation does not repeats.

2.3.2.2 The staff of the Internal Control System

Functional requirements within the SCI:

Technical Committee: composed of technicians, it determines the cultural and agronomic practices applied by producers, and is responsible for the documentation and recording of data, input supply. internal evaluation committee composed of technicians, representatives of the Board and resource persons (relay), this committee evaluates based on the internal control report non-compliance detected a member and apply the provisions laid down.

Director of IBS: IBS primary responsibility, he oversees the coordination of activities internal controllers: Technical officers identifying subunits, monitoring compliance with the requirements at the sub-units, units, sites and project facilities; They are helped in this task by the resource persons (relay) which due to their presence in the units and locations ensures closer monitoring.

Trainer: a person responsible for training and capacity building.

Regardless of the number of employees of SCI, the head of SCI must develop an organization to provide a clear picture of the accountability of staff duties. SCI staff must have a clear definition of roles and responsibilities assigned to resource management and training. In addition, the staff hired to fill roles in a SCI should have the following qualifications:

be fluent in the local language and dialect of the group members;
have the ability to read, write and make reports in the language chosen by the SCI;
have a good knowledge of the requirements of organic production and preparation;
be familiar with local agricultural production systems;
be familiar with the principles and practices of organic farming and preparation;
demonstrate competence in the internal control procedures and understanding of internal regulations (enabling test).

2.3.2.3 Potential Conflicts of Interest

Internal auditors may face a conflict of interest with their immediate surroundings and be in trouble if we report non-compliance. This is a reality for individual projects as producers for projects of "grower groups". To limit the potential number of nonconformities not reported, the staff of the internal control system must receive a written guarantee that it will not suffer consequences as a result of the detection and reporting of non-compliance. In essence, this written assurance of the group or the "person" creates a "firewall" protection for internal auditors. In addition, the staff should also be required to disclose, in writing annually, any potential conflict of interest prior to the external inspection.

ICS staff could be considered to have a conflict of interest inherent in its obligation to ensure that the group maintains its organic status. The group can avoid conflicts of interest for example by mandating the internal controllers in different regions and villages from which they originate. Also by regularly changing the controllers of the various units, sites and installations, the group can avoid collusion between staff and members. Members of the group must report any changes that may affect product conformity. The certification body shall also receive this information from the ICS staff.

2.3.3 Training Requirements

The success of an ICS is significantly increased through continuous training for all members of the group and all IBS staff. For most organizations, internal staff performs most of the training of members of the group, but at least once a year training with an external specialist is recommended for IBS staff. The internal control of a producer group requires a lot of discipline and time. SCI staff training efforts optimize the efficiency of internal controls and the internal review process. Training is seen as the key to ensure that the group members understand and comply with organic production standards.

2.3.3.1 Training for members of the group: in order to better meet the organic standards of the group members should enjoy the modules for the technical procedures of production respecting the biological quality of the product. If members can not read or write, functional literacy training are desired for them to note the dates of the transactions. Other courses such as composting, keeping operating accounts in local languages are needed.

2.3.3.2 Training for ICS staff: the understanding of ICS staff who is responsible for monitoring compliance with the requirements is crucial for the proper functioning of the ICS. To achieve modules on the regulations and standards of organic production need to be better assimilated and adapted to the types of projects. This may need outside expertise when internal skills are not sufficient. The certification body will ensure the level of training and understanding of the ICS staff.

Note: Especially for NOP, if the annual turnover of the business certified by a member of a grower group exceeds an amount equivalent to US \$ 5000, it should be considered a separate unit and controlled annually.