



Guideline on Organic certification of grower groups according to EOS and NOP Regulations

PREAMBLE

This guideline is a compilation of requirements coming from Ecocert Organic Standard (undersigned "**EOS**") and NOP Regulation as well as the mandatory additional rules for Organic Growers Group, respectively:

- for EOS: Annex XI based on EU Guidelines (2008; part 8) on imports of organic products into the European Union
- for NOP: NOSB Recommendation (2002): Criteria for Certification of Grower Groups undersigned "**NOSB02**"
- for NOP: NOSB (National Organic Standard Board) Recommendation (2008): Final Recommendation on Certifying Operations on Multiple Sites undersigned "**NOSB08**"

Grower group certification means that the Certification Body (CB) gives the possibility to an entity to be certified for the whole organic production provided by the members within the group. To qualify for group certification, the entity commits to comply with specific requirements as described hereby, operating a documented Internal System (Internal Control System – ICS / Internal Quality System – IQS) for the management of the Group.

Depending on the internal system of the group, two types of inspection by Ecocert are possible:

- ECOCERT carries out annual external inspection on a sample of growers (sample size and selection of growers defined by Ecocert) to check the relevance and efficiency of the ICS. otherwise
- ECOCERT carries out externally annual inspection on 100% of the growers included in the group, when their number permits it, and checks the relevance of the Internal Quality System. It implies that inspection and certification costs may be higher than in the first case but in case of critical non-conformities found at the level of single producers, the risk of downgrading could be limited to the non-conform producer and not to the whole group.

Document references are listed in Chapter V.



This document does not replace current Regulations. For full detailed information on organic production requirements, please refer to related official Regulations and technical guidelines.

I. Definitions

Internal Control System (ICS) or Internal Quality System (IQS)

A written quality assurance system that sets forth the practice standards, recordkeeping and audit trail requirements applicable at each production unit, facility or site and that identifies the internal verification methods used.

Inspection based on sampling: audit carried out by sampling part of a group

Re-inspection rate (IR): the sample which is inspected by the external certifier, to evaluate the ICS/IQS's performance.

Group legal representative: the entity certification owner who signs the contract with Ecocert and who is in charge of monitoring the requirements described in this document in the whole group.

Growers group: group of legal entities or persons, whose production processes are organized by a common structure. The phrase "Group" used in this document includes the whole operations notified within the certification scope under the responsibility of the certification owner.

Production Unit: the portion of an organic operation where products are produced and/or handled post-harvest, including any sub-unit located within geographic proximity. A production unit operates under the operation's organic system plan, and is managed through an internal control system to ensure compliance with all provisions of the Regulations. Each production unit within a production or post-harvest handling operation has defined location, practices, management and/or products.

Purchase Center: Intermediary unit in charge of buying, handling and selling the organic products from the registered Group growers to the Group (ICS/IQS operator).

Sub-Unit: a smaller discrete portion of a production unit, such as producer, a field, plot, wild-crop harvest area, or distinct processing area.

Site: The location of management activities for a given production unit.



II. Eligibility and scope

Eligibility and certification requirements are different depending on whether the inspection is done by sampling or on 100% of the producers by ECOCERT. All requirements listed in parts II, II, IV and annexes 1 and 2 must be fully respected for an inspection system based on sampling whereas only requirements identified in the 3rd column "100% audit rules" (from parts II, II, IV and annex 1) apply for inspection done on 100% of the producers by ECOCERT.

To qualify for the inspection system based on sampling or on 100% of producers, the following preliminary requirements must be fully met at the time of application (see Step 1 in Annex 5):

	Ref EOS	Ref NOSB	100% audit rules				
- The group must be located in a developing country (as per OECD ¹ definition)	1.f) An XI		X				
- Growers or sub-units must all be located in close geographic proximity ²	1.a) An XI	NOSB 08.III	X				
- The group is generally composed of smallholders but can also include major growers (as per definition below)	An XI 1.e)		X				
<table border="1" data-bbox="92 1064 1157 1243"> <thead> <tr> <th>Annual turnover of the farm ³ (EU Guideline 2008)</th> <th>< 50 x cost for annual individual certification⁴</th> <th>> 50 x cost for annual individual certification</th> </tr> </thead> <tbody> <tr> <td>Category</td> <td>Smallholders</td> <td>Major growers</td> </tr> </tbody> </table>		Annual turnover of the farm ³ (EU Guideline 2008)	< 50 x cost for annual individual certification ⁴	> 50 x cost for annual individual certification	Category	Smallholders	Major growers
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Category	Smallholders	Major growers					
Basically, small growers mean growers whose production is mainly obtained by family labor. This notion includes smallholders as well as out-growers who farm rented lands. Organizations which employ farming workers are not considered as Growers Group (plantations, State farm, etc.).			X				
Group certification applies to all kinds of crops or livestock included in the scope of EOS and NOP Regulations.	1.2	NOP.1 00	X				
Wild crop can also be organized in the way of group certification (multi-site project)	IV (B).7	NOSB08 .III	X				

¹ DAC list of ODA recipients is available [here](#).

² Geographic proximity, as defined by access to the same collection or post-harvest handling facility, and/or common soils, water source, slope, topography or other physical features. This is also to help internal and external control (time for traveling between members of the group). The proximity geographic should be discussed case by case with the CB, it able to a good management and an homogeneity of the group (crop practices, local language, members should be brought together easily, etc....) (NOSB, 2008).

³ The turnover represents the whole sales of farming activities of the grower (organic and conventional products).

⁴ This cost can be estimated by the annual direct cost for individual assessment added to shared cost for assessment of centralized operations of the group (EA Guidelines EA-6/04 :2011).



The Group legal representative must be established as a legal entity (cooperative or association, or private company, etc.). The group can be structured as stand-alone group or may be affiliated to a processor or an exporter under a binding agreement (see Annex 6 template of organization). Process or export units can also be a part of the group. In all cases, a complete organization chart or scheme of the group must be available.	An XI 2.a) & 6.d)	NOSB02#2B, NOSB08.III.D.2,NOSB0 8.III.D. NOSB02#1	X
Group members must work under similar production systems or farming practices (same procedures, etc.).	An XI 1.a) & 3.a)		X
Use of inputs by growers must be done under the centralized management and responsibility of the ICS/IQS (For example: The ICS/IQS provides to the members the list of inputs approved or the ICS/IQS has a procedure to review the requests from members for use of inputs before any application, etc.).	An XI 1.c)	NOSB08.B	X
Producer group operations must utilize centralized processing, distribution, marketing facilities and systems. Record-keeping protocols must be consistent. It is not acceptable that individual production units, sites, or facilities differ in their methodology of record keeping.	An XI 1.a) & b)		X
In case of a large group (for example, more than 500 growers), recommendations are that the group should be divided in sub-groups (villages, or group of villages, etc.) according to geographical localization in order to optimize the ICS and to prevent risks in case of certification withdrawal further to non-compliances (please refer to chapter on sanctions in case of non-compliance).		Ecocert, recommendatio n from the Indian Regulation NPOP	
Products with a reference to organic farming are to be sold exclusively through the Group legal representative.	An XI 1.b)	NOSB08.III .B	X
ECOCERT must approve the designation of specific members or subunits as belonging to a single production unit. All members or sub-units within a production unit: <ul style="list-style-type: none"> ○ are unified by a shared training regimen ○ operate together under the same section of the producer group operation' single OSP (including inputs used, fertility management and pest control practices, livestock feeding and health care practices and record keeping and audit trail system) ○ use inputs under the centralized management and responsibility of the ICS/IQS ○ share common personnel responsibility for managing operations, monitoring and enforcing the functioning of ICS/IQS ○ use a single post-harvest processing system ○ produce similar products and share harvest schedule 	An XI 1.c), 2.a) & 5.b)	NOSB08.III.C	X
An upper limit on the number of members or subunits included in a given Production Unit should be based on the feasibility of effective oversight by management personnel and factors such as size and accessibility of the subunits.			



III. Internal Control System (ICS) or Internal Quality System (IQS)

General content of ICS/IQS

	Ref EOS	Ref NOSB	100% audit rules
ICS/IQS implementation and dynamics, under the responsibility of the certification owner, are preliminary requirements for the group to qualify for certification. The Organic System Plan is included in the ICS/IQS. The ICS/IQS must be implemented and operating before the initial audit by ECOCERT.	5.a) An XI 2.a) &	NOSB08.II.B .III.C,D	X
The ICS/IQS is a documented system describing group practices and organization. The basic conditions required are listed in <i>Annex 1 « Required information in the ICS/IQS »</i> .	3.a) An XI 2.b) &	NOSB08.IIIp .5.III.D.2	X
ICS/IQS assessment by ECOCERT is carried out in 2 steps: <ul style="list-style-type: none"> - Documentary review and assessment: at initial application submission, at annual renewal and in case of major changes⁵ - On-site assessment: during the external control, ECOCERT will carry an assessment of the conformity and the ICS/IQS efficiency 	VIII (A).1.a) & 3 An XI 1.d)	NOSB08.III.C	X

Grower registration

	Ref EOS	Ref NOSB	100% audit rules
Growers applying to join a growers group must be registered. ECOCERT must be informed without delay.	VIII (B).2 An XI 3.d)	NOSB08.D1, D2iii	X
A contract (or written agreement) must be signed between each grower and the Group legal representative (a template of contract can be available on demand). The terms and conditions should encompass a commitment to comply with rules on organic farming, according to the applicable Regulation and grower's agreement to allow free access to his farm for internal and external audit purpose	An XI 4.a) & b)	NOSB08.IIID2i	X
Records associated with each grower must include a full description of the farm: all plots and facilities, a detailed map of plots included in the operation as well as plots farmed as conventional with a related crop and livestock management history.	An XI 5.f) 6.a & c)		X

⁵ Major changes is related to modification within the group (product and practices, functioning of ICS, change of owner, of structure or management team) or modification of requirements for certification (applicable organic Regulation, Ecocert certification system,...) or any other element involving consequences on product conformity.



A clear and sufficient ⁶ separation between organic and non-organic plots, animals and products is required (buffer zones, physical barriers, separate and adequate storage, Etc.).	VIII (B) 1.a.iii) An XI 6.b)	NOSB02#2Bp5, NOP201.a)5	X
In case of new addition (subunit, grower, parcel, crop, etc.), the part of the production related to the new portion may only be marketed as organic once requirements defined by ECOCERT are fully met.	VIII (B).2 An XI 3.d)	NOP.102	X
All new entrants to a Production Unit must be inspected on-site in the first year with the group and approved by ECOCERT before marketing their products as organic to the Group.	An XI 3.d)	NOSB08.III. D	X

Internal inspectors (or field officers)

The ICS is based on compliance assessment of the growers by internal inspectors, and ability to maintain this conformity. The inspectors have to meet the requirements specified in Annex 2.

Internal controls' performance

The purpose of internal controls is to check if growers strictly comply with requirements of designated organic farming standards (EOS and/or NOP and/or national Regulation). Internal inspectors are meant to check the compliance to the applicable requirements on crop/livestock production/handling and inform ICS managers when they identify non-compliances.

	Ref EOS	Ref NOSB	100% audit rules
At least one onsite internal inspection a year is carried out in each farm	An XI 5.d), e) & f)	NOSB08. III.D.2	
- Sufficient time should be dedicated for a complete internal inspection of fields, facilities, buying spot depending on the complexity, accessibility to the farm and suitable period.			
- Internal inspectors should inspect the whole farming operation including plots and animals located out of the main site and conventional plots.			
- During the internal inspection, the grower or the farm manager should attend the inspection.	An XI 5.e)	NOSB08.III.D2I,NOS B02#2A	
- During the inspection, the internal inspector has to refer to previous inspection report in order to check that potential corrective actions have been implemented and are efficient.	An XI 6.e) & h)		

⁶ A sufficient separation prevents any contamination of organic fields by non-compliant substance from a risky area or facility.



- In case of change ⁷ on the farm (new plots, new crops, change of owner, etc.), farm records and maps have to be updated.	An XI 6.a) & e)	NOSB08.III.D 2i	
A documented inspection report is drafted by the internal inspector at every farm inspection. It should include all information related to changes, identified non-compliance, implemented corrective action and previous actions monitoring (examples of inspection report are available upon request).			

Group legal representative duties

	Ref EOS	Ref NOSB	100% audit rules
Technical assistance to all members (ex: centralized management of inputs, information on Regulation...)	An XI 1.c) & 2.e)	NOSB08.III.D3	X
Enforce for all members organic regulations and related requirements to the certification system and internal rules within the group.	An XI 3.e) & 5.b)		X
- Notify ECOCERT of any change ⁸ : Production unit/ sub-unit/grower/product/plot addition or withdrawal, addition/modification of internal audit procedure, identified non-compliance, specific growers being excluded or suspended from the group, etc...)	VIII (B).2 An XI 3.c), 6.f) & i)	NOSB08.III.D2i	X
- Enforce sanctions within the group by group decision in order to ensure that harvest and certified product are compliant.		NOSB 08.III.D2.i	
- Enforce within the group sanctions taken and communicated by Ecocert following external audits.	An XI 3.c)		X

Group decision making

Group decision-making process may be under the responsibility of one single person or a committee, such as the executive management team of the Group legal representative.

Duties are:

- Supervise internal inspectors
- Implement processes to promote objectivity amongst internal inspectors and other ICS/IQS staff. Examples of potentially conflicted interest:
 - o the internal inspector is also a grower
 - o the internal inspector is also a farming consultant
 - o the internal inspector is related or friends with the inspected grower
 - o the ICS decision manager is related or friends with the concerned grower

⁷ See note 4

⁸ See note 5



	Ref EOS	Ref NOSB	100% audit rules
- Quality assess internal inspection reports, keep grower records updated (growers, units, internal inspectors, ...)	An XI 6.a) & e)	NOSB08.III. D.2i NOSB08.III.	
- The internal control plan must include a list of check point according to the risk, and possibly updated annually regarding non-compliances identified during previous inspections.	An XI 1.a) & 5.a)	NOP.201, NOSB08.III.C	
- In case of critical non-compliances casting doubt on product integrity and compliance with the regulation, ECOCERT must be informed immediately and concerned products identified and separated.	VIII (K) 2.a), An XI 6.i)	NOP.400f),NOSB 08III.D2	
- Implement corrective actions or sanctions for the growers and ensure a follow-up on the implementation and on the efficiency.		NOP.100c),NOS B08.III.D2i	X
- Inclusion of new sub-units or growers or facilities only after inspection and after conclusion on compliance by ECOCERT.	An XI 3.d) & 5.d)	NOSB08III.D 1,NOSB02#2 B	
- Ensure that excluded or suspended entities no longer contribute to the group production and that related products have been excluded from the certification production.	VIII (K) 2.a)	NOP.100c)	X

Examples of internal sanctions within the group which can be applied by the group itself following the detection of non-compliance further to internal control:

Non-compliance	A grower used a non-compliant substance but did notify immediately the field officer (internal inspector) or the group	A grower deliberately used a non-compliant substance without notifying the group or the internal inspector
Examples of sanction	Plots and products: suspension of designated plots that shall undergo a new conversion period. Decertification of products. Products from the other organic fields can be marketed	Plots and products: Decertification of all the plots and products.
	Grower: remains part of the group	Grower: the member cannot sell any more his production with organic reference for a given period



IV. External control, certification, non-compliance and sanctions

Preliminary requirements before external inspection by ECOCERT

	Ref EOS	Ref NOSB	100% audit rules
In case of previous organic certification, the Group legal representative must provide ECOCERT with the previous audit report, previous certificates and related documents	Art 4.3 CGV (C06)	NOP406a1, NOSB02#2A	X
Previous notices issued by the previous Certification Body must be provided to ECOCERT	4.3 CGV (C06) Art	0 NOP2601(han dbook),NOP20	X
Prior to the audit the Group legal representative should provide ECOCERT with at least two contact persons in charge (phone numbers, both home and work).	An XI 2.a)	NOSB02#2A	X
The grower group certification means that the Group legal representative is in charge of the application of requirements by the whole growers and subcontractors involved. In this context, the Group legal representative must take into consideration that non-compliance detected at grower's level may cause suspension of the certification of the group as a whole . An inadequate ICS failing to identify internal non-compliances and to take required measures may typically increase the risk of group suspension. Required measures can be: <ul style="list-style-type: none"> - immediate actions for product and plots regarding to scope of the non-compliance (decertification, ...) - correctives actions on growers and on the group regarding the origin of the deviation (training, procedure, disqualification of related internal inspectors, etc.) - a follow-up and checking of efficiency 	An XI 1.a) & d)	NOSB02:introduction,background, NOSB02#1	X

	Ref EOS	Ref NOSB	100% audit rules
The preliminary requirements for the group to qualify for certification are listed in chapter 1 of this document and in <i>Annex 1</i> (Required information in the ICS/IQS). Additional criteria to be met before the initial external inspection of the group are: <ul style="list-style-type: none"> - 100% of internal inspections have been done on all farms, with inspection reports documented and reviewed by the group decision team - All members (including growers and purchase centers) have an adequate knowledge of organic rules related to their activity. 	An XI 3.e) 5.b) & d), 6.e)	NOSB08.III.D2I	X Only for the 2nd point



The external inspection by ECOCERT

	Ref EOS	Ref NOSB	100% audit rules
<p>ECOCERT carry out assessment (its conformity and its ability to maintain this conformity) at different levels (see annex 5):</p> <ul style="list-style-type: none"> - assessment of suitability and efficiency of the ICS/IQS (organization, manual, procedures and instructions, spreadsheets, contracts, list, trainings) - Group compliance assessment with organic rules (examination of each production unit, facility or site) - Assessment of suitability and efficiency of internal audits (internal reports, sanctions taken) - supervision of one or several internal inspectors on-site 	VIII (B).3, An XI.1.(d) & 3.(b)	NOSB02#2B	<p>×</p> <p>Only for the two 1st points</p>
<p>For EOS: Group compliance with rules on organic farming is assessed through auditing systematically major growers (as defined in Chapter 2), all processing/export facilities, all purchase centers and a sample of small growers.</p> <p>For an EOS OGG 100% inspected by Ecocert, group compliance with rules on organic farming is assessed through auditing systematically 100% of the producers and all processing/export facilities and purchase centers.</p>	An XI.1.(e)		<p>×</p> <p>Only 2nd paragraph</p>
<p>For NOP: Group compliance with rules on organic farming is assessed through auditing systematically all processing/export facilities, all purchase centers, all production units and a sample of subunits.</p> <p>For a NOP OGG 100% inspected by Ecocert, group compliance with rules on organic farming is assessed through auditing systematically 100% of the producers and all processing/export facilities and purchase centers.</p>	VIII (B).3	NOSB08.III.D	<p>×</p> <p>Only 2nd paragraph</p>
<p>The number of small growers or subunits to be visited (re-inspection rate) by ECOCERT is based on a risk analysis, notably depending on reliability of the group (please refer to grid in Annex 3).</p>	An XI.1.(e)	D.1 NOSB08.III.	
<p>This risk assessment is carried out by ECOCERT as per the following criteria:</p> <ul style="list-style-type: none"> - the number of production units and sub-units, sites, facilities participating in the producer group operation - the degree of uniformity among the sub-units within a production unit - the complexity of the production system - the management structure of the ICS - prohibited material applied adjacent to a sub-unit within the previous year - significant expansion of size of the sub-unit - split or parallel production - the rate of growth in new members - complexity of types of sub-units and/or products marketed - the prevalence of conventional production of the same type in the region - whether a post-harvest handling or livestock facility of any kind is included - Compliance with Internal Training - Frequency of minor non-compliances - grossing \$5000 or more in US organic sales per year 	VIII (B).3	NOSB08.III.D.1	
<ul style="list-style-type: none"> - value of the product and price differential between organic and conventional products - degree of similarity between various production systems and between various 	VIII (B).3	T ECOCER	



<p>crops within the group</p> <ul style="list-style-type: none"> - risk factors related to intermingling and/or contamination - type and number of issues noted during inspections in previous years and results of previous assessment of the ICS/IQS 			
<ul style="list-style-type: none"> - the size of the average production unit and sub-units or grower - New entrants to the producer group operation - the number of years the producer group operation has functioned - staff turnover - conflict interest management, specifically with regards to internal auditors 		NOSB08.III.D.1	
<ul style="list-style-type: none"> - ICS/IQS efficiency (ability to identify non-compliances in time and monitoring corrective actions) 	VIII (K) 2.(a), An XI 1.(d) & 3.(c)	ECOCERT	
<ul style="list-style-type: none"> - reactivity of the Group legal representative regarding to its duty for coordination with ECOCERT: ability to promptly implement actions and inform ECOCERT, ability to update internal data and forward them to ECOCERT before implementation 			X
<p>The re-inspection rate may be increased by ECOCERT depending on identified non-compliances or dysfunctions. When ICS appear to be unreliable or inefficient, the rate may be increased according to the grid in <i>Annex 3</i>.</p>	EU08.E19	NOSB02#B	
<p>Once calculation is finalized, smallholders or sub-units to be inspected are selected by sampling according to a risk analysis with several criteria (size, spilt operation, storage facilities, etc.) in order to select representative sample:</p> <ul style="list-style-type: none"> - when the group is organized in multiple locations, all locations are to be audited - when multiple crops are involved, all crops are to be audited 	An XI 1.(e)	NOSB08.III.D.1	
<p>For NOP, once calculation is finalized, the highest risk subunits are identified to be inspected. The highest risk subunits are those with parallel production (organic and non-organic). Of the remaining sample to be inspected annually, at least 25% of the subunits should be selected at random (chosen by the inspector).</p>			

Possible sanctions further to external inspection by ECOCERT

<p>When ECOCERT identifies critical⁹ non-compliances, in the working on the ICS or not adequately corrected, sanctions are applied at group' level.</p> <p>The scope of these sanctions depends on the level of group's responsibility: sub-unit, producer, production unit or the whole group. At any case, the application of sanctions and implementation of corrective actions is under the responsibility of certification owner.</p>	An XI 1.(d), 6.(f) & h)	NOSB02:backgroud, NOSB08.III.D.2	
<p>Any non-compliance detected regarding the performance of ICS can lead to an increase of re-inspection rate.</p>		EU08.E1	NOSB02 #2B

⁹ A critical non compliance is a deviation that casts doubt on product certification and then group certification. For example, if a grower used a non compliant substance but the ICS detected it without applying sanction or any corrective action, this deviation is considered as a critical non compliance.



Certification

Certification is granted once: <ul style="list-style-type: none"> - all non-compliances have been solved and - the ICS/IQS is considered efficient and reliable. 	An XI 1.d)	NOSB02. background	X
If the ICS is not efficient nor reliable, ECOCERT will increase gradually the inspection rate up to 100% of small growers or sub-units as long as necessary (see Annex 3).			
A single certificate is issued for the whole group with an attached listing of growers.	An XI 1.a) &	NOSB0 2. #1	X
Once certification is achieved, any change must be notified to ECOCERT by the Group' Responsibility for the re-assessment of the project; the quality of communication with Ecocert is a condition for maintain of certification as a group.	VIII (B).2	NOSB02#2. D3,	X



V. References

- Ecocert Organic Standard (**EOS**)
<http://www.ecocert.com/sites/default/files/u3/Ecocert-Organic-Standard.pdf>
- the NOP (National Organic Program) Standard relative to organic farming in the United States of America undersigned "**NOP**" –
<http://www.ecocert.com/en/nop-regulation>
- EU Guidelines (2008; part 8) on imports of organic products into the European Union
http://ec.europa.eu/agriculture/organic/files/news/download-material/guidelines_for_imports_en.pdf
- NOSB (National Organic Standard Board) Recommendation (2008): Final Recommendation on Certifying Operations on Multiple Sites
<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELDEV3104550>
- NOSB Recommendation (2002): Criteria for Certification of Grower Groups
<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5074507>
- EA Guidelines on the Accreditation of Certification of Primary Sector Products by Means of Sampling of Sites - <http://www.cofrac.fr/documentation/EA-6-04>
- IAF Mandatory Document (IAF MD 1:2007) for the Certification of Multiple Sites based on Sampling - <http://www.cofrac.fr/documentation/IAF-MD1>
- NPOP: The National Program for Organic Production (India)
- ISO 2859 - Sampling rules for inspection by attributes

VI. Entry into force and application

This guideline entered into force on 2011 November, 7th and it was applied from 2012 January, 1st.

Version 7 from 2017, March 09th.

Modifications done: Integration of purchase centers. Update of requirement based on changes done in the Group checklist. Updates of all annexes on specific points.



Annex 1 – Required information in the ICS/IQS

Requirements	Documents (information required)	Ref EOS	Ref NOSB	100% audit rules
Proof of legal entity of the Group legal representative	Document	An 1.a) XI	#1 NOSB02	X
A contractual arrangement with each member	Contract, other written agreement (Template F26 available)	An 4.a) XI	2#2.B NOSB0	X
Description of detailed organization of the group: responsibilities, relations between members, duties	Detailed organization chart/scheme Listing and contact details of Management staff (phone, address)	An 6.d) XI 3.a) &	A NOSB02#2.	X
Description of decision making system	Structure (identification of the ICS decision Manager or Committee) and process of decision-making	An XI 3.a)	.A NOSB02#2	
List and code of members (growers, purchase centers) and subcontractors, in case of the grower does not cultivate or rear by himself, the list of persons involved in the production, date of entry of members in the group and/or start of fields conversion, productive surface, estimate quantity/yield, fields historical, classification, etc.	Updated list (preferably Excel Table) (Template T06 available on request)	An XI 6.a), b) & i),	NOP201, NOSB02#2A	X
Description of location of farms and units for storage, processing/export (eventually with GPS coordinates)	General map indicating the general region of the production zone with scale Detailed map aiming the localization of the farms by zone	An XI 6.c) & d)	1 NOSB02#2A, NOP.20	X
Description of product steps and measures implemented for organic production according to the risks as well as staff in charge of the operation at each step (rotation, conventional crops, preventive measures against crop diseases, measures of separation, management of inputs, etc.)	Any document: table for risk analysis filled (Example available in annex 4) For the NOP, Organic System Plan Flowchart or any other document with clear explanations, list of estimate export countries Framework of product labels	An XI 3.a), b) & c)	NOP.201, NOSB02#2.C	X



Description of traceability system, organization of members and separation of harvest, animal and animal products.		An XI 6.k)	NOSB02 # 2A	X
Description of organization of members in sub-units		An XI 6.d)	NOSB0 8.III.C	
Description of ICS (Organization of annual internal audit plan: content and frequency of an internal inspection, recordkeeping system, etc.)	Document with description Provide last ICS annual report: <ul style="list-style-type: none"> • compliance with the standards, • report on internal audits done, conclusions and corrective actions undertaken • report on new farmers/fields integrated and farmers sanctioned • farm/project economy -financial report- • OGG/ICS changes and updates 	An XI 2.b), 3.d), 5.a), 6.e) & f)	NOP.103/201,NOSB02#2AG	
Procedure for integration of a new member, new plot, new facility or new crop/product	Procedure (showing step from application to approval)		NOSB 02#2A	X
Internal control team Internal inspection reports	Name and phone numbers of internal inspector Some examples of filled out inspection report (Template F48 available on request)		NOSB02#2A, NOSB08.III.D.2ii	
Description and analysis of possible case of conflict of interest for internal inspectors and other ICS/IQS staff: himself grower, family relationship with members, conflict of interest, backhander, lobbying, etc.	Any document (to be updated each year)	An XI 2.c)	NOSB08.III.D.2ii	X
Description of sanction decision procedure in case of non-compliance found during internal or external audits (taking into account recurrences and if the member informed the group or not) including for the suspension or exclusion of members or subunits and a plan for corrective action to be implemented before the member or subunit can be readmitted.	List of sanctions regarding the type of non- compliances and modality for application. For example, decertification of a product and plot and/or suspension of the grower. Identification of ICS/IQS staff assigned for taking sanction decision. Procedure for notification of internal and external sanctions to concerned members (growers, purchase centers, etc.)	An XI 3.c)	NOSB08.III.D.2i	X



Annex 2 – Requirements on Internal Control System Personnel

Requirements	Ref EOS	Ref NOSB	100% audit rules
- the group must have a sufficient number of qualified internal inspectors (1 for 500 members maximum)		NOSB02.# 2.D.1	
- all internal inspectors are registered (list) even if there is a Management for internal inspectors, their other activities are clearly described (employed, grower, technician, ...)	An XI 2.(b), c) & d)	NOSB08.III.D.2ii	
- They carry out effectively and exhaustively the internal controls.	An XI 2.d)		
- they can speak fluently the language of the members	An XI 2.d)		
- they can write reports in the language used in the ICS/IQS (may be reviewed by ECOCERT)	An XI 2.d)		
- they are fully aware of principles and practices of organic farming (particularly EOS and NOP Regulation) and post-harvest handling	An XI 2.d)	NOSB08.III.D.3	
- they know farming production systems used by the members	An XI 2.d)		
- they received adequate training on current regulation and on their duties as internal inspector (documented proof), indicate the name of the trainers (members of decision structure or external of the group)	An XI 5.c)		
- All ICS/IQS staff including internal inspectors are objective (i.e. neutral and independent) in their internal control and sanction task or they notify immediately the potential risk of losing objectivity (see <i>Annex 1</i>)	An	NOSB08.III.D.2iii	X
- They received contractual assurances that under no circumstances are they to be admonished in any way because they have detected <i>and reported</i> a non-compliance.			



Annex 3 – Table for calculation of minimum re-inspection rate of smallholders or sub-units by ECOCERT in case of an OGG to be inspected by sampling
(An XI 1.e, NOSB08.III.D1)

1 – Estimate minimum re-inspection rate before external inspection

The following table shows the re-inspection rate of smallholders/sub-units estimated during the documentary review of ICS (see step 2 in Annex 5), which is weighted according to the level of risk (EU Guidelines 2008). Higher will be the risk, higher will be the re-inspection rate by Ecocert. Up to 90 smallholders or sub-units, this rate is calculated by the square root of total smallholders' members or sub-units n.

Number of smallholders - sub-units (n)	2 to 15	16 to 90	> 91	
Estimated minimum re-inspection rate	ALL	10	Low risk	$1 * \sqrt{n}$
			Medium risk	$1,2 * \sqrt{n}$
			High risk	$1,4 * \sqrt{n}$

2 - Confirmation or modification of re-inspection rate during the inspection based on sampling

During external inspection by Ecocert, if critical non-compliances (that casts doubt on product certification) have been detected by Ecocert but have not been detected internally by the ICS, sanctions to be decided by Ecocert may impact all the harvested products of the group.

In case ECOCERT finds the ICS to seriously lack reliability and effectiveness, re-inspection rate will be reinforced for the next annual inspection of the group as indicated in the table below:

Number of smallholders - sub-units (n)	2 to 15	16 to 25	26 to 50	51 to 90	> 91
Estimated <u>reinforced</u> minimum re-inspection rate	ALL	15	21	28	$3 * \sqrt{n}$

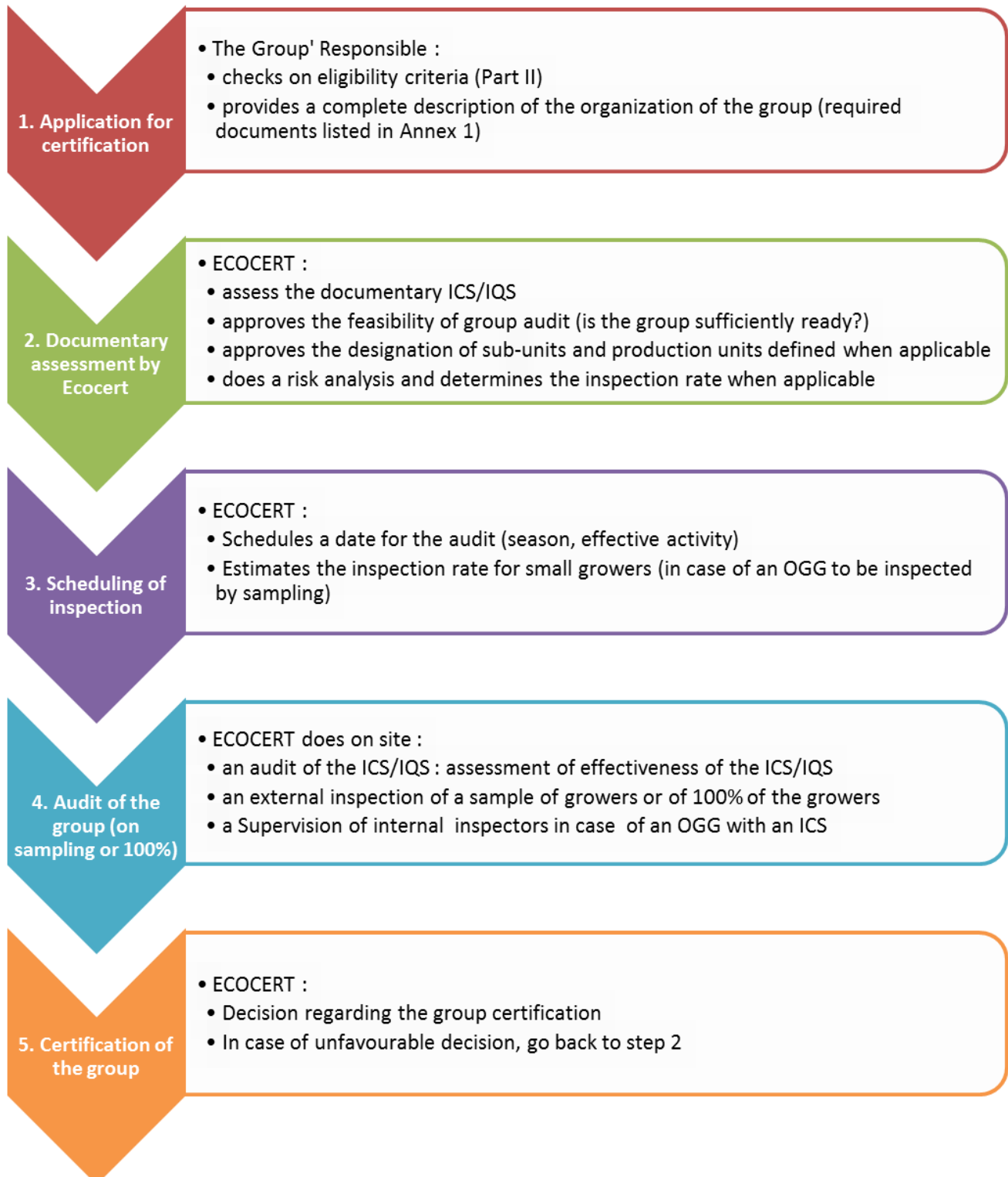


Annex 4 – Example of Risk Analysis

Steps	Risk	Implemented actions
<p>Crop Preparation of soil: selection of fields and rotation, green manure</p> <p>Seedling or plantation</p> <p>Management of weeds</p> <p>Management of diseases and potential insect attack</p> <p>Harvest or collection, storage</p> <p>Livestock Origin of animals</p> <p>Feed</p> <p>Health care practices/disease prevention</p> <p>Husbandry practices/housing conditions</p> <p>Beekeeping Origin and renewal of the apiaries</p> <p>Siting of the apiaries/foraging area</p> <p>Housing conditions</p> <p>Disease prevention</p> <p>Honey harvest</p>		
<p>Purchase/Storage/Process/Export Transport to the purchase center / processing unit</p> <p>Traceability system at the purchase center /processing unit</p> <p>Storage</p> <p>Drying, handling</p> <p>Packaging</p> <p>Labeling</p> <p>Packing and Export</p>		



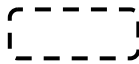
Annex 5 – Group Certification Process



Annex 6: Template of an organizational flowchart for a Growers Group and organization of inspection and certification



The frame entity in red defines the « Group legal representative », who is managing the ICS/IQS, who is the certification owner and signs the contract with Ecocert.



Dotted line represents the certification scope under the responsibility of the Group legal representative to be certified in one project.



Operation to be inspected annually by Ecocert



Two inspection options:

1. 100% of growers are inspected by Ecocert annually
2. A sample of growers from each production unit is inspected by Ecocert annually and 100% of growers are inspected by the ICS annually

