



Grower Group Certification Criteria

NASAA CERTIFIED ORGANIC (NCO) provides internationally recognised certification services for organic, fair trade and other relevant certifications, applying the relevant standard/s with consideration for local, regional and cultural specificity.

These services determine compliance with and set conditions for compliance to the relevant standard/s.

The Grower Group program supports trade in certified organic products from small producers, without compromising or diluting the strict requirements of international organic and fair trade standards.

GLOSSARY

Grower Group- is an organised grouping of producers (referred to as growers) with similar farming and production systems. It may be organised as a grower co-operative, or as a structured group of growers affiliated to a processor/exporter. The organisation is known as the operator.

Internal Control System (ICS) – the grower group management system and the staff who carry out the functions of that system to manage the grower group certification requirements

Grower Group Management/organisation – the legal identity which provides definition and oversight to the grower group, certification requirements and the ISC

Management Plan – Also referred to as System Plan for NOP, this is the written plan for how all elements of the grower group certification requirements will be managed and activities carried out in compliance with certification requirements

1. Criteria

- 1.1 Grower group certification is only applicable to international applicant organisations. This certification category is not applicable to organisation based within Australia.
- 1.2 Grower Group certification is based on the implementation and ongoing maintenance of an organisational management plan. This plan must include a framework for an internal control system that manages the group, including annual internal inspection, and training opportunities for grower members. The grower group organisation must also provide oversight to all entities in the supply chain.
- 1.3 Grower Group certification is monitored by annual external inspection by the certifying organisation NCO. NCO provides oversight for the relevant certification standard/s. External inspection must verify that an applicant/operator demonstrates compliance with all required elements before certification can be issued or continued.
- 1.4 The grower group management system, the supply chain and a percentage of growers are inspected at the annual external inspection. The percentage of growers inspected at each annual inspection visit is determined by the effectiveness of the grower group organisations' internal control system and the organisations management of identified risks.
- 1.5 Complex farming systems, complex processing and end of chain wholesalers, exporters and traders must be inspected and certified separately. Any individual operation identified to be of a size/scale, diversity of activity, and/or separate export streams will be excluded from the grower group certification and assigned an individual certification identity number and process. Complex operations, although they may be related to/part of the



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supply chain for the grower group, will be subjected to all routine NCO inspection procedures including annual inspection.

2. Definition

- 2.1 The grower group must develop and maintain an effective internal quality assurance system known as an Internal Control System (ICS). This ICS must systematically integrate all sites and production units to provide the assurances necessary to reduce the need for direct observation by external inspection.
- 2.2 Production units as well as grower land / primary production includes any site where produce is handled post-harvest, such as interim storage and initial processing sites. Each production unit has defined location, practices, management &/or products. The person responsible for each production unit will sign a contract to become a member of the grower group. An upper limit on the number of group members is based on the potential ability of the ICS to manage the group.
- 2.3 Participation in the grower group shall comprise of growers who practice similar farming systems. This means that all members or units within a production unit:
 - 2.3.1 Are unified by a training regimen
 - 2.3.2 Operate together under the group's Organic Management Plan including inputs used, fertility management, pest & disease practices and record keeping / audit trail system
 - 2.3.3 Work in compliance with the Internal Control System (ICS)
 - 2.3.4 Use documented group collection, handling, post-harvest facilities and processing systems
 - 2.3.5 Produce similar products.
 - 2.3.6 Are within reasonable geographical proximity
- 2.4 Any production unit that processes or consolidates products for more than themselves and one other member must be inspected annually. Desk review may be a component of this.

3. General requirements for all grower group organisations

- 3.1 Operators shall demonstrate documented compliance with the relevant Standard/s and to this policy and procedure when applying for and/or maintaining certification program/s.
- 3.2 Applications and correspondence with NCO must be in English.
- 3.3 Organisations will develop, implement and maintain a documented Management Plan for the whole operation.
- 3.4 Applicants must appoint a representative to act as their intermediary with NCO. The representative shall have sufficient understanding of both the organisation's local language/s and of English, and be able to demonstrate that the organisation fully understands the Standards, guidelines, procedures, documents and records required. This position is required to be maintained for as long as the organisation is certified with NASAA. If the person in the operators representative role changes NCO should be notified in a timely manner.
- 3.5 The Internal Control System (ICS) staff will act as coordinator of the Grower Group and are responsible for the groups' day-to-day compliance with the Standard/s and requirements of certification. The ICS must demonstrate completion of 100% internal inspection for all production units in the supply chain at least once annually.



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- 3.6 The organisation must provide at least a summary of the relevant standard/s to all grower group members in local language. The group must supply a translation of this outline to be approved by NCO.
- 3.7 Organisations must be able to demonstrate active organic management by individual grower members and that prohibited materials have not been used for at least 36 months prior to organic certification being granted to individual grower land.
- 3.8 Organisations must make timely preparation and cooperate fully to NCO annual external inspection requirements. Inspection deposits are required in advance on an annual basis.

4. Entry requirements for grower members

- 4.1 A conversion period of at least two years will be applied before growers can be considered for inclusion in the certified organic grower group list. Specific timing includes two years before sowing, or, in the case of grassland or perennial forage, at least two years before its use as feed from organic farming, or, in the case of perennial crops other than forage, at least three years before the first harvest of organic products.
- 4.2 The ICS must develop and follow a procedure to verify and record management practices in the conversion period ensuring
 - 4.2.1 products used on the applicant land for 36 months prior to certification were acceptable
 - 4.2.2 management practices for the time specified in 4.1 were in keeping with the relevant Standard/s
 - 4.2.3 relatively unbroken traditional practices are in placeThis procedure must be approved in advance by NCO.
- 4.3 Satisfactory proof for the verification of conditions noted in 4.2 must be provided by the operator / ICS. Sufficient records of proof should include the following:
 - 4.3.1 Country or regional official declarations of traditional /acceptable practices in at least the three years leading up to the application for organic certification
 - 4.3.2 Written grower declarations regarding the land management of the previous 36 months
 - 4.3.3 Relevant third party signed declarations confirming individual and/or regional land management practices in at least the three years leading up to the application for organic certification.
 - 4.3.4 Comprehensive Soil analysis

If these proofs cannot be provided the member must remain In Conversion for the relevant period with recorded oversight by the ICS.

5. Legal Relationships

- 5.1 The grower group shall be established formally (i.e. must be a legally constituted group), based on written agreements with its members. It shall have central management, established decision making procedures and legal capacity.
- 5.2 The certified entity shall be the group as a whole. The grower group must agree to be legally bound by written contract with NCO. The group entity must be a corporation, association, cooperative or other entity.
- 5.3 Production units, sites & facilities within a certified organic grower group do not possess individual certificates. A certificate is issued to the group as a whole only and produce from that group can only be sold with the



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agreement of the Grower Group managing entity. Individual members of the group may not represent themselves as certified other than through the group.

- 5.4 The grower group must have a written contract with each member operator confirming the member operator's understanding and compliance with the relevant Standard, outlines the consequences of non-compliances and sanctions; permits internal inspections by the ICS and external inspections by NCO. The contract may be written in the language specific to the group of growers and must be translated into English for the certification application.
- 5.5 The contract must have a clause requiring the group member to report any changes that might affect the operation's compliance, including intentional or accidental chemical spray drift or application of a prohibited substance.
- 5.6 The grower should have received a copy of the contract they have signed.

6. Centralised Management and Internal Control System (ICS)

- 6.1 The ICS Management Plan/s must include policy and procedures for certified activities, and identify record keeping and audit trail systems for all production units, facilities or sites included in the grower group system.
- 6.2 The ICS must have sufficient and competent personnel, financial and technical resources to manage and implement a system incorporating the Management Plan and to maintain conformity with the relevant Standard/s that the organisation is seeking/maintaining certification for.
- 6.3 It is the role of the ICS to safeguard the certified status of the entire operation and thus the eligibility of the group as a whole for certification. The ICS management must have decision making procedures which are separate from the internal inspection and have an established risk management system.
- 6.4 Communication facilities must be adequate such that communication between the ICS and NCO is easily achievable (i.e. workable telephone and fax or email system at a minimum).
- 6.5 The group shall have a training regimen that includes training of group members, ICS staff and internal inspectors.
- 6.6 Requirements for ICS personnel shall include the following:
 - 6.6.1 Fluency in the local language and dialect of the group members (or access to suitable local interpreters).
 - 6.6.2 Reading & writing skills to report in the chosen ICS language & English
 - 6.6.3 Understanding of the applicable Standards for each program for which certification has been applied/achieved including how those principles apply in the local region/s.
 - 6.6.4 Familiarity with the local agricultural production systems and cultural norms.
 - 6.6.5 Familiarity/understanding of relevant critical control points relating to all grower sites, production units, post-harvest handling processes and other sites in the supply chain.
 - 6.6.6 Understanding of the ICS procedures and regulations
 - 6.6.7 Current declaration of conflicts of interest and confidentiality statements for all ICS staff
 - 6.6.8 A contract specifying employment parameters including a clause that defines staff member rights and responsibilities in reporting noncompliance.



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7. Record Keeping Requirements

- 7.1 The Internal Control System (ICS) shall develop and maintain all the following items
- 7.1.1 An organisational chart defining staff roles and responsibilities
 - 7.1.2 Job descriptions with roles and responsibilities for all ICS personnel;
 - 7.1.3 A protocol for assessing and managing risks associated with the group including a documented set of critical control points for all activities of the operation requested for or included in the certification;
 - 7.1.4 A procedure for managing annual internal and follow-up inspections for all group members;
 - 7.1.5 A template for recording internal inspection visits which includes risk control points and level of understanding of standards and requirements;
 - 7.1.6 A documented procedure to identify and manage conflicts of interest within the group;
 - 7.1.7 Management and recording of noncompliance, and resulting sanction
 - 7.1.8 A procedure for ensuring that NCO is notified of major non-compliances within the group;
 - 7.1.9 A procedure for accepting new members to the group;
 - 7.1.10 Staff and inspector training records.
- 7.2 The ICS shall maintain grower/unit operator records as part of the Organic Management Plan. The record keeping system must be consistent across production units. Grower/Unit Operator Records shall include at least the following:
- 7.2.1 All members in the group by name and identification number
 - 7.2.2 The date when each grower/unit joined the group
 - 7.2.3 Hectares certified & crops produced/processed (including cash crops) and yield estimates.
 - 7.2.4 Production records including inputs used, fertility management, pest & disease practices
 - 7.2.5 Harvest, sale/collection and processing sufficient to make a complete audit trail
 - 7.2.6 Internal inspection of each member including verification of compliance
 - 7.2.7 Details of non-compliances and resultant sanctions
 - 7.2.8 A record of which member have been externally inspected by NCO & date
 - 7.2.9 Adequate detailed maps of individual sites and regional locations for all production units
 - 7.2.10 Flow charts for all products including every stage of the supply chain
- 7.3 In recognition of extended families/villages/regions or whole islands who have a well-managed policy and practice traditional practices the following may be applied.
- The ICS will collect:
- 7.3.1 One written contract signed by representatives for the group
 - 7.3.2 A written statement from local authorities to verify past and present land management practices
 - 7.3.3 One land history for the whole area requested for certification. This should include any exceptions within that area (e.g. natural resource or local authority mandatory requirements which insist on management practices not acceptable to the standard)
 - 7.3.4 A list of all growers by name, land location and size of individual land areas.
 - 7.3.5 A map of the entire area noting individual landholdings



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7.3.6 A flow chart of the entire supply chain from grower's production, any initial processing and movement of produce

The ICS will keep a management file for this information, refreshing the grower list and other documents at least annually.

The ICS will conduct annual inspections of all growers contributing to the supply chain plus 5% of the non-contributing landholdings including any central village areas.

The contract will nominate one contact for the group and include a commitment of the group to notify the ICS of any non-compliance by individuals within the group.

8. Internal Inspection Requirements

8.1 Internal inspectors designated by the group management shall be qualified, competent and participate in ongoing training relevant to the requirements of the position.

8.2 Inclusion of new entrants to the group shall only be after entry documentation and internal inspection is completed and approved within the groups written procedures for accepting new applicants (with reference to 4.1 & 4.2 of this document).

8.3 Internal inspectors shall carry out at least one annual inspection visit to each member including visits to all fields and facilities associated with that member. Internal inspections must document all non-compliances and verification of corrective actions.

8.4 The ICS must communicate in writing with individual group members regarding all irregularities and minor non-compliances found, including the corrective actions imposed with agreed time for completion.

8.5 The ICS must maintain records of all non-compliances detected in the group including the agreed time for completion of corrective actions. Instances of major noncompliance by a group member must be reported to NCO.

8.6 Any member or production unit that wilfully violates the organic standards shall not be permitted to re-join the group until NCO approves measures taken to ensure that the violation is not repeated.

8.7 Where the ICS has failed to detect or act on a major noncompliance committed by a group member, NCO will separately raise a major noncompliance for the ICS and also apply sanctions to the group as a whole, including, in case of serious deficiencies, the withdrawal of certification of the entire village where the noncompliance occurred.

9. External Inspection Requirements

9.1 NCO shall inspect the group annually. Annual external inspection by NCO shall examine and evaluate site-specific activity to verify that the organic management system plan accurately reflects the practices used and the operation may be seen to comply with the relevant standards, criteria and international regulations.

9.2 Eight weeks before annual inspection is due NCO will issue Management Plan Update template/s and invoice to notify the grower group organisation of the annual inspection event.



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- 9.3 Prior to inspection NCO Certification officers will review information provided by the operator representative. Inspection should not proceed until the certification officers are satisfied by this desk review that the organisations operation is in compliance and ready for inspection. This information includes
- 9.3.1 Management Plan update/s
 - 9.3.2 Evidence of correction of any non-compliance from the previous external inspection or deficiencies in the application documents
 - 9.3.3 Operator readiness for external inspection
- 9.4 At the inspection event NCO Inspector will assess the following information provided by the operator representative:
- 9.4.1 Verification of the Management Plan/s for relevance and compliance
 - 9.4.2 Internal control documentation including implementation of required procedures
 - 9.4.3 Verification that Internal inspections of all operators have been carried out at least annually
 - 9.4.4 Records indicating that instances of non-compliance have been managed appropriately
 - 9.4.5 The operators in the group understand the relevant Organic Standard and risks to the organic integrity of the group is managed effectively
- 9.5 External inspection is usually required prior to new growers and production units achieving full organic certification with NCO for the relevant programs. If new growers and or production units are to be added in between external inspection, records verifying procedures must be approved by NCO before any produce from the new growers can be included in certified organic finished product.
- 9.6 The external inspection by NCO shall include the witnessing by the NCO inspector of several internal control inspections undertaken by the ICS.
- 9.7 In the event that the group's Internal Control System is identified as not having detected or acted on a major noncompliance, NCO will separately raise a major noncompliance, one for the affected group and one for the ICS.
- 9.8 In the event that the group fails to act on noncompliance's issued by NCO, suspension or decertification will be applied to the group. Wilful violation will result in decertification.

10. Risk Assessment

10.1 Risk assessment is completed by NCO to identify the percentage of grower group members to be inspected. For normal risk situation the number inspected shall not be lower than the square root of the number of members of the group. Within the set selected, the highest risk members shall be identified and inspected with the remaining sample, at least 25% to be selected on a random selection basis for inspection.

For medium risk situations, the risk factor is 1.2

The high risk factor is 1.4.

In the situation that NCO finds the ICS to seriously lack reliability and effectiveness, the number of group members subject to external inspection will increase to at least 3 times the square root of the number of members in the group.



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Minimum amount of growers to be inspected by external inspectors

<i>Number of group Members = n</i>	<i>Normal Risk factor 1</i>	<i>Medium risk Risk factor 1.2</i>	<i>High risk Risk factor 1.4</i>
<i>n</i>	<i>Square root of n</i>	<i>1.2 square root of n</i>	<i>1.4 square root of n</i>
<i>Minimum</i>	<i>10</i>	<i>12</i>	<i>14</i>
<i>50-99</i>	<i>10</i>	<i>12</i>	<i>14</i>
<i>100-199</i>	<i>10</i>	<i>12</i>	<i>14</i>
<i>200-499</i>	<i>14</i>	<i>17</i>	<i>20</i>
<i>500-999</i>	<i>22</i>	<i>27</i>	<i>31</i>
<i>1000-1999</i>	<i>32</i>	<i>38</i>	<i>44</i>
<i>2000-4999</i>	<i>45</i>	<i>54</i>	<i>63</i>
<i>5000</i>	<i>71</i>	<i>85</i>	<i>99</i>

Factors to define risk:

- The number of members participating in the grower group
- The size and complexity of the average component in the operation
- The uniformity/diversity among the members
- Single or Multiple/diverse products produced
- Issues for geographical distance/area
- Level of understanding among new entrants to the group
- Significant expansion of the group
- Risks associated with parallel production in the supply chain
- The effectiveness of the internal control system.
- The number of years the grower group has functioned
- Any previous problems/non-compliances within the ICS
- Staff turnover
- Potential conflict of interest
- Whether livestock is part of the supply chain
- Compliance with Internal Training requirements

References

- IFOAM Criteria 2005 section 8.3 & 7.5.2
- EU Guidelines on Imports of Organic Products to the European Union – version 2008/12: Section 8: Guidelines for the Evaluation of the Equivalence of Organic Producer Group Certification Schemes applied in Developing Countries
- NOSB Recommendation to the NOP November 19 2008: Certifying Operations with Multiple Production Units, Sites & Facilities under the National Organic Program
- NASAA Organic Standard



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- AQIS National Standard for Organic and Biodynamic Production
- JAS Inspection Certification System Handbook
- JAS Site Inspection Handbook
- Institute for Ethical and Environmental Certification CERTIFICATION REGULATION – FOREIGN SECTOR ANNEX Reg. (EC) No. 834/07 and Reg. (EC) 889/08 as amended