

QUALITY MANUAL FOR INTERNAL CONTROL SYSTEM (ICS)

GROWER GROUP

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National Programme for Organic Production (NPOP)

The APEDA, Ministry of Commerce & Industries, Government of India is implementing the National Program for Organic Production (NPOP). The program involves the accreditation of Certification Bodies, standards for organic production, promotion of organic farming and marketing etc. The NPOP standards for production and accreditation system have been recognized by European Commission and Switzerland for unprocessed plant products as equivalent to their country standards. With these recognitions, Indian organic products duly certified by the accredited certification bodies of India are accepted by the importing countries. APEDA is also in the process of negotiation with South Korea, Taiwan, Canada, Japan etc

Organic products are grown under a system of agriculture without the use of chemical fertilizers and pesticides with an environmentally and socially responsible approach. This is a method of farming that works at grass root level preserving the reproductive and regenerative capacity of the soil, good plant nutrition, and sound soil management, produces nutritious food rich in vitality which has resistance to diseases.

Export of organic products

A product will be allowed to be exported as “ORGANIC” only when accompanied by a transaction certificate issued by the CB accredited by National Accreditation Body for organic products under NPOP.

Organic products for export will be certified only if produced and packed as standards laid down in the NPOP document available in the APEDA website (www.apeda.gov.in)

India is bestowed with lot of potential to produce all varieties of organic products due to its various agro climatic conditions. In several parts of the country, the inherited tradition of organic farming is an added advantage. This holds promise for the organic producers to tap the market which is growing steadily in the domestic and export sector.

As per the available statistics, India's rank 8th in terms of World's Organic Agricultural land and 1st in terms of total number of producers as per 2020 data (Source: FIBL & IFOAM Year Book, 2020).

AREA

As on 31st March 2021 total area under organic certification process (registered under National Programme for Organic Production) is **4339184.93 ha** (2020-21). This includes 2657889.33 ha cultivable area and another 1681295.61 ha for wild harvest collection.

Among all the states, **Madhya Pradesh** has covered largest area under organic certification followed by Rajasthan, Maharashtra, Chhattisgarh, Himachal Pradesh, Jammu & Kashmir and Karnataka.

PRODUCTION

India produced around **3496800.34 MT** (2020-21) of certified organic products which includes all varieties of food products namely Oil Seeds, fibre, Sugar cane, Cereals & Millets, Cotton, Pulses, Aromatic & Medicinal Plants, Tea, Coffee, Fruits, Spices, Dry Fruits, Vegetables, Processed foods etc. The production is not limited to the edible sector but also produces organic cotton fiber, functional food products etc.

Among different states Madhya Pradesh is the largest producer followed by Maharashtra, Karnataka, Rajasthan and Uttar Pradesh. In terms of commodities Oil seeds are the single largest category followed by Sugar crops, Cereals and Millets, Tea & Coffee, Fiber crops, fodder, Pulses, Medicinal/ Herbal and Aromatic plants and Spices & Condiments.

EXPORTS

The total volume of export during 2020-21 was **888179.68 MT**. The organic food export realization was around **INR 707849.52 Lakhs (1040.95 million USD)**. Organic products are exported to USA, European Union, Canada, Great Britain, Korea Republic, Israel, Switzerland, Ecuador, Vietnam, Australia etc.

In terms of export value realization Processed foods including soya meal (57%) lead among the products followed by Oilseeds (9%), Cereals and millets (7%), Plantation crop products such as Tea and Coffee (6%), Spices and condiments (5%), Medicinal plants(5%), Dry fruits (3%), Sugar(3%), and others.

GROWER GROUP CERTIFICATION

PREAMBLE

The National Program for Organic Production (NPOP) provides for Standards for organic production, systems, criteria and procedure which is required to be implemented **complied** by any operator who seeks certification from any accredited certification body. It encompasses the National (India Organic) Logo and the regulations governing its use. These standards and procedures have been formulated in synchronization with other International Standards regulating import and export of organic products. This manual provides as a guideline towards fulfillment of implementation **in line with the for grower groups, sub severing** the objectives of National Standards for Organic Production (NSOP).

1) SCOPE

Grower Groups are organized group of farmers /producers who intend to produce organic products/engage in organic processes in accordance with NPOP **the National Standards of Organic Production**.

The producers in the group must apply similar production systems and the farms should be in geographical proximity.

This corresponds to clause 5.1 of Chapter 5 of NPOP standards.

2) COMPOSITION OF ICS OR GROWER GROUP FORMATION/THE INTERNAL CONTROL SYSTEM (ICS)

This corresponds to clause 5.2 of Chapter 5 of NPOP standards.

Internal control system forms the bedrock of grower groups functionalities. The grower group could take the shape of cooperatives, Farmer Producer Groups (FPOs), Partnerships, Limited liability partnership (LLPs), Private Limited Companies etc. and any other firm or company having legal entities. In case the farmers cannot run the ICS, they may enter into a contract with an external Service Provider/Mandator/Trader to facilitate the maintenance of internal control system, training, co-ordination and marketing of certified produce and to facilitate the certification from an accredited CB. Such arrangements shall be backed by written agreement executed between Mandator and ICS.

The producers in the group must apply similar production systems and the farms should be in geographical proximity. Individual farms with land holding of 4 ha (10acres) and above can also be a part of the group but will have to be inspected separately every year by the accredited Certification Body. The total area of such farms shall be less than 50% of the total area of the group. The grower group shall consist of minimum 25 and maximum 500 farmers. Processors and exporters/traders can own/manage the Internal Control System (ICS) but will have to be inspected annually by the external CB. Separate certificates (Scope and Transaction Certificates) are required to be issued for the ICS, processors and traders to maintain the traceability of the product flow. The ICS groups are to apply to the accredited CB as per **ANNEX-1** and the member to grower group contract as per **ANNEX-2**.

The Certification Body shall not certify if there is no ICS as per NPOP and 100% internal inspections are not conducted. In case the farmer group does not maintain an Internal Quality System as described in this chapter, the Certification Body shall inspect all the farms on random basis based on risk assessment carried out by trace net system.

Most Important to remember

1. Grower group shall have minimum of 25 farmers and maximum of 500 farmers
2. The farms should be in geographical proximity
3. Individual farms with land holding of 4 ha (10 acres) and above can also be a part of the group but will have to be inspected separately every year by the CB. The total area of such farms shall be less than 50% of the total area of the group

VISION OF ICS

The vision should enumerate long term policies of the grower group (ICS) for implementing a sustainable organic farming program. To develop a socially and environmentally responsible business that contributes towards the conservation of natural resources resulting in social, economic and environmental sustainability.

MISSION OF ICS

To adhere and comply with the NPOP standard requirements, in word and spirit across all operations of the grower group.

3) PURPOSE OF CERTIFICATION

Organic certification addresses a growing worldwide demand for organic food. It is intended to assure quality and prevent fraud. For organic producers, certification identifies suppliers of products approved for use in certified operations. For consumers, "certified organic" serves as a product assurance, similar to "low fat", "100% whole wheat", or "no artificial preservatives". Certification is essentially aimed at regulating and facilitating the sale of organic products to consumers. Individual certification bodies have their own service marks, which can act as branding to consumers—a certifier may promote the high consumer recognition value of its logo as a marketing advantage to producers. Most certification bodies operate organic standards that meet the National government's minimum requirements.

4) OVERVIEW OF OPERATING AREA OF THE GROWER GROUP

The operating area of the group should detail the agro climatic conditions of the project sites, soil type, and the geographical distance from the ICS office location to the various villages covered under the project. The group should provide the project map indicating the notional location of the villages. Availability of sources of irrigation, livestock status should also be indicated.

The following areas also should be incorporated while narrating the operational

area of the group:

- Introduction of history and background of your company/ICS/farmers and association with organic production & formation of group
- The diversity of species - crop rotation, mixed annual/perennial system, intercropping, cover crops, description of the landscape (natural surroundings)
- Mention about sources, varieties, non-GMO status, if own production then previous year's saved seeds or planting details, management of perennial plants
- Mention any off farm inputs used (seeds/inputs to control pest, disease & weeds) and approval taken prior to use
- Past status/use of the land and environmental condition and any effect on environment by the farmers
- Mention about Packages and Practices followed for various crops

Tentative Crop Calendar:

Months	Activities
May–June	Harvesting, Storage & Selling of Zaid crops & Field preparation for coming Kharif season (Ploughing, manure application)
June-July	Kharif crop sowing & transplanting
	Organic manures application and Intercultural operations
August–September	Organic control measure for pest and disease
October–November	Harvesting of Kharif crops
November–December	Field Preparation and Sowing of Rabi crops
February–March–April	Harvesting & storage of Rabi crops
March –April	Field Preparation & Sowing of Zaid crops

Note: Above mentioned calendar are tentative for whole year and varies from crop to crop. The complete information related to the field condition can be fetched from individual farm diary.

5) LEGAL STATUS OF ABC Organization

- The legal status to cover the following:
- Relevant statute (like society, company act, registered partnership etc)
- PAN Card Number
- Aadhar card Number of board of directors/office bearers
- ICS to Mandatory agreement
- Agreements & Others (Rental agreement, ownership evidence of office premises)
-

6) **CONCEPT OF INTERNAL CONTROL SYSTEM**

This corresponds to clause 5.3, 5.4, 5.4.1, 5.4.2, 5.4.3, 5.4.4, 5.4.5 and 5.4.6 of Chapter 5 of NPOP standard.

Grower group or ICS is based on Quality Management System which comprises of following:

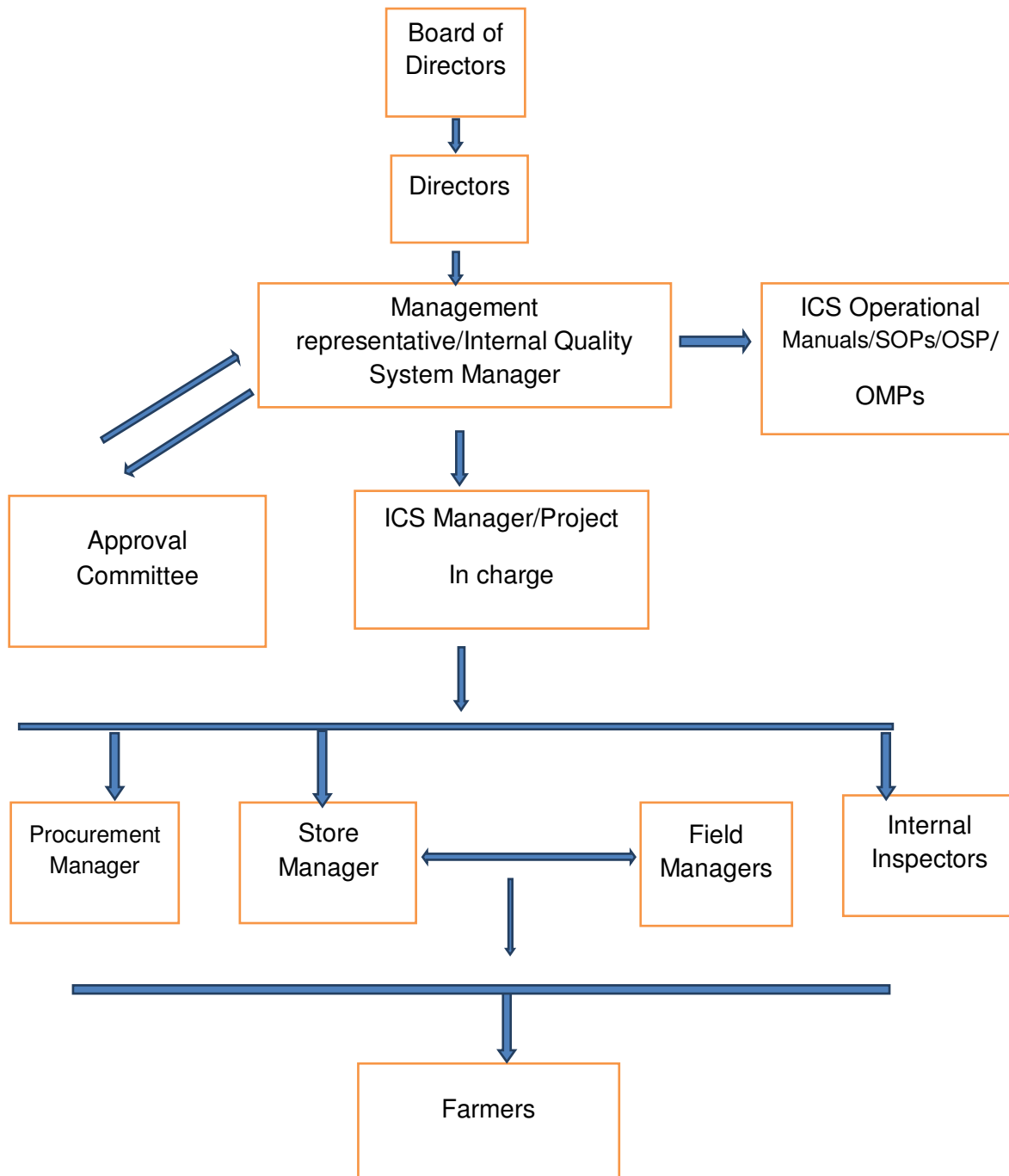
- 6.1) Implementation of the Internal Quality System
- 6.2) Internal standard
- 6.3) Risk assessment

6.1 IMPLEMENTATION OF THE INTERNAL QUALITY SYSTEM

Certain criteria or points need to be taken care when developing and implementing the Internal Quality system. These are as follows:

- Development of Internal Control System (ICS) manual containing policies and procedures
- Identification of farmers in the group
- Creation of awareness about Grower Group Certification
- Identification of qualified/experienced personnel for maintaining the Internal Control System
- Give necessary training in production and ICS development
- Implementation of the policies and procedures
- Review and improvement of the ICS document for maintaining a harmonized quality management system.

Constitution of Organization



➤ ROLES AND RESPONSIBILITIES OF ICS STAFF

i) **Board of Directors**

Overall In charge for implementation of NPOP program

ii) **Management representative/Internal Quality System Manager**

- Coordinate with all stakeholders and certification body for smooth conduct of Project and External Audits.
- To execute various audit documents during external audits. ICS Operational Manuals/SOPs/OSP/
- OMPs

iii) **Approval Committee**

- To review the farm inspection reports and screens the conversion status according to the Internal Organic Standard.
- To allot a new code number and mark this code number on all documents of the farmer. Anyone from the approval committee can sign as approval committee personal.

iv) **ICS Manager/Project In charge**

- To manage the documents generated in the ICS
- To coordinate the internal and external inspection
- To make arrangement of inspection at each stage where is require e.g. processing, transportation etc.
- To manage the documents generated in the ICS at field level
- To coordinate with the ICS project staff
- Supporting external advisors and Internal Inspectors by providing them clear information on standards and ICS guidelines
- Checking the Internal Inspectors reports and giving feedback
- Approving Internal Inspection Reports
- Deciding on Admission, Conversion status and sanctions
- Calling in support from technical and social advisors when needed
- Ensuring total documentation structure is in place
- Supporting the external certifier with information when needed
- Responsible for overall management of the project, authorized to sign inspection forms for external certification

v) **Procurement Manager**

- To ensure that only organic products are bought and maintain organic integrity
- To clean storages and avoid contamination
- To sign receipts of organic product

vi) Store Manager

- To ensure storage of the harvested produce after procurement in a hygienic manner
- To prevent comingling of organic/in conversion produce
- To maintain traceability of produce based on the store records

vii) Field Managers

- Responsible of execution and data evaluation of the information gathered from ICS from grass root level.
- Supporting farm group representatives in ensuring clean harvesting
- Supporting farm group representatives in implementing track and trace system
- Supporting farmers in filling in the Farm Diary
- Ensuring that one copy of the Farm Diary is made available to: the farmer, the local Field Office and the Approval Committee
- Monitoring and reporting on any Non-compliance, using the Non-Compliance Report
- Training /education/technical assistance/extension on organic farming practices/standards to the farmers
- Supporting (without any conflict of interest) farmers by providing them clear information on standards and ICS guidelines of organic production
- Supporting farmers in documentation management and on farm input production
- Training /education/technical assistance/extension on organic farming practices/standards to the farmers
- Conducting exposure visits and promoting INM and IPM

viii) Internal Inspector

Internal inspectors play very important role and it is the connection between the farmer and Mandator. Responsible for the data/ information collection and drive the farmer consent in a planned way. Also responsible for crop verification, farmer verification and risk identification and same would be communicated to upper hierarchy.

Major role of internal inspectors are:

- ☐ Checking the Non-Compliance Reports from the field
- ☐ Making internal inspection visits to all farmers and writing Internal Inspection Reports
- ☐ Screening Admission applications
- ☐ Reporting on above tasks to Approval Committee
- ☐ Support in developing the ICS policies and procedures
- ☐ Checking the Non-Compliance Reports on Random Basis
- ☐ Making internal inspection visits to Random Selected farmers
- ☐ Cross Verify the Screening Admission applications

ix) Farmers

All the farmers registered in the group **after internal inspection is** forms the producer group. Deletion or addition of farmers takes place from time to time which needs to be intimated by CB.

➤ CONFLICT OF INTEREST

This corresponds to clause 5.6 of Chapter 5 of NPOP standards.

All operating staff of the ICS like internal inspectors, Field Officers, Project Manager, members of approval committee, purchase officer etc are required to execute conflict of interest document upon joining of ICS to the effect that they do not have any vested interest nor any farmer interest related to them(e.g. an internal inspector cannot inspect his family members). Please refer **ANNEX-3**.

6.2 INTERNAL STANDARD

This corresponds to clause 5.5 of Chapter 5 of NPOP standards.

This needs to be drafted in local language besides English. If the farmers are illiterate, the internal standards shall contain illustrations in the text for better understanding.

The internal standards would contain: -

- Definition of production unit- The production unit refers to the farmers cultivating area, exclusive under organic farming system ICS control. it should denote location of farmer fields, survey number identifiable by GPS coordinates and respective farm maps for each farmer associated with.
- Crop Plan- refers to the Organic System Plan (OSP) and Organic Management Plan (OMP) which is listed in **ANNEX- 4**. Although this is provided by CB. It is listed here as it forms a prime document which has to be internally addressed.
- How to deal with Conversion/ Part conversion/ Parallel production and Split production
- The format for developing internal standard is indicated in **ANNEX- 5**

6.3 RISK ASSESSMENT (CRITICAL CONTROL POINTS ANALYSIS)

This corresponds to clause 5.5 of Chapter 5 of NPOP standards.

The risk assessment is unique to each farm and may vary at every stage of production. In order to assess the risks at each farm, a member of the ICS (normally Internal Inspector) will assess the risk assessment along with the internal inspection (Internal inspection report contains the Critical control points for risk assessment). The separate Risk Assessment Report will be filled at group level **ANNEX-6**.

6.3.1 CRITICAL FACTORS IMPACTING RISK OF ORGANIC CROP PRODUCTION

➤ Conversion

The process of changing an agricultural farm from conventional to organic farming. This is also called transition. The time between the start of organic management, and the certification of crops as organic. In case of annual and biennial crops, plant products produced can be certified organic when the requirements prescribed under these Standards have been met during the conversion period of at least two (2) years (organic Management) before sowing (the start of the production cycle).

In case of perennial plants other than grassland (excluding pastures and meadows), the first harvest may be certified as organic after at least thirty six (36) months.

Conversion Provision

- The establishment of an organic management system and building of soil fertility requires
- an interim period, known as the conversion period. While the conversion period may not always be of sufficient duration to improve soil fertility and for re-establishing the balance of the ecosystem, it is the period in which all the actions required to reach these goals are started.
- A farm may be converted through a clear plan of how to proceed with the conversion. This plan shall be updated by the Operator, if necessary and shall cover all requirements to be met under these standards.
- The requirements prescribed under these standards shall be met during the conversion period. All these requirements shall be applicable from the commencement of the conversion period till its conclusion.
- The start of the conversion period may be calculated from the date of first inspection of the operator by the Certification Body.

➤ Part Conversion

Part conversion is the stage or situation when conventional; in conversion and/or organic production occur in the same unit.

Part Production Provisions

- Appropriate storage capacity exists to ensure separate handling
- that the documentation regarding the production is well managed and makes a clear distinction between certified and not certified production right across the chain of custody.
- that inspections are carried out at critical times; that inspection is done in a timely manner; that accurate production estimates are available.

➤ **Parallel Production**

Defined as any production where the same unit is growing products both of certified organic quality and of non-certified organic quality. A situation where "organic" and "in-conversion" production of the same product is carried out, is also parallel production.

Production Parallel Provisions

If a farm is engaged in parallel production, the certification program shall ensure, in addition to the requirements for part conversion the following: -

- Buffer zones are maintained for demarcation
- Crops are visually distinguishable or the crops are harvested in such a way that there are reliable methods to verify the actual harvest of the respective crops (i.e. inspections between harvests, extra inspections during harvests).

➤ **Split Production**

Where only part of the farm or processing unit is certified as organic. The remainder of the property can be (a) non-organic, (b) in conversion or (c) organic but not certified.

6.3.2 PROCEDURES FOR IMPLEMENTATION OF ICS

This corresponds to clause 5.9 of Chapter 5 of NPOP standards.

➤ **ENROLLMENT OF NEW FARMERS**

This corresponds to clause 5.9.1 of Chapter 5 of NPOP standards.

Each new farmer who wishes to be registered as a member needs to apply in Farm Entrance Form as per **ANNEX-6**.

This will be vetted by respective field officer submitted for initial approval by Project Manager/Approval Committee Member. Later on it is subjected to inspection by the concerned inspector followed by admission.

During this inspection following areas are covered:

- The requirements and obligations of being an organic farmer are explained.
- The Extension Officer draws a simple sketch of the farm with all plots of the farmer, rough indication of present crops, potential risks of drift.
- Once the documentation is completed, the information will be processed to the ICS office.
- The farm application form is screened by the Project Manager/Approval personals and the conversion status is determined according to the Internal Organic Standard.
- The farmer also signs the Contractual agreement with Farmers Group.
- Once accepted, the farmer is assigned a new code number which will be reflected on all documents of this farmer.

This code is unique to the farmer and will follow the following pattern.
EGF/ORG/YYYY/Vill Abbreviation/Numerical as per admission number
EGF= Company Name
ORG=Organic
YYYY of Admission =Year
Village Abbreviation=

➤ **DOCUMENTATION OF THE ICS AT FARM LEVEL**

This corresponds to clause 5.9.2 of Chapter 5 of NPOP standards

Each member of the grower group will be supplied with docket in local languages, which will contain the following:

- The primary document is a comprehensive one in the shape of farm diary which records all agronomic practices from trainings, input application records, farm maps with GPS coordinates cultural practices, infrastructure, livestock status etc.
- Additional information specific to the ICS can also be recorded in this document. It serves as a repository of all farm operations at one glance.
- The farm diary **ANNEX-7** is maintained by farmer wherever possible supported by the designated ICS staff and is made available during external audits.
- The data of all farmers and the results of the internal control are summarized in the farmer list and the list of sanctioned farmers.
- Farm data sheet, to indicate last use of prohibited inputs
- Farm Diary which should indicate the main crops cultivated use of inputs, harvested quantities.
- Prevailing farming system and package of practices available for the area
- Schedule on training program.

➤ **DOCUMENTS CONTROL**

This corresponds to clause 8.3 of ISO 17065 standard

- All formats/records unless controlled by a system of document control procedure are considered unauthorized. Therefore, all the formats and annexures referred in this manual should bear specific control number to validate its use.
- Each page of this document contains the Company Name, document name and number, Company Address, Author name, Approval name, issue number and effective date of issue. Obsolete documents will be rescinded in separate file stamped as Obsolete. The retention period is till next year external organic audit of the system.
- The retention period of all documents are minimum 05 years.
- Specific document control procedure is formulated by way of SOPs. Subscribing to specific standard document control requirement.

➤ **ORGANIC SYSTEM PLAN (OSP) AND ORGANIC MANAGEMENT PLAN (OMP)**

- Organic system/management plan is the basic document for certification. The producer involved in crop production and intending to sell, label, or represent agricultural products as organic must develop organic system plan. This document is precursor for scheduling the external audits and is required to be submitted by the ICS along with the initial application form.
- This documents deals with the production plan for the entire operating year and speaks about Organic Management Plan to deliver the planned objectives which confirms to the various requirements of NPOP standards.
- All areas listed in OSP is mandatory to be addressed which is initially appraised by the CB and it implementation is assessed during CB audit.
- The format of OSP and OMP is provided by the CB.

➤ **EXIT PROCEDURE OF MEMBERS FROM GROWER GROUP**

This corresponds to clause 5.9.3 of Chapter 5 of NPOP standards.

- The members in a grower group shall have the right to exit the ICS subject to payment of dues of ICS if any. The application format for exit of member farmer from Grower Group with Internal Control System is at **ANNEX-8**.
- Thereafter, the ICS shall provide formal exit approval from the contract, to the exiting operator at the end of the notice period. The exit approval format for a member farmer from a grower group is at Annex 8.
- The grower group accepting a new member from another ICS, shall inform the accredited Certification Body immediately.
- The accredited Certification Body shall take measures to verify the credentials and documentation of the new member during the sample inspection.
- The accredited Certification Bodies shall exchange the relevant information among themselves when the member exits from one group and joins another group.
- To maintain the traceability, the accredited Certification Body should check the product flow, i.e. quantity produced by the individual farmer within the group, self-consumption and quantity sold.
- Individual farmers in the grower group shall not market their product individually as certified organic.

➤ **INTERNAL INSPECTIONS**

This corresponds to clause 5.11 of Chapter 5 of NPOP standards

It is mandatory to conduct minimum two internal inspection of the Farmers Group covering 100 % farmers in a year depending on the crop risk involved before external audit is scheduled.

One during Kharif crop.

Second during Rabi crop.

The following areas are inspected during internal inspection and recorded in the internal inspection report:-

- Checks if all fields have been correctly registered with reference to land records, as per Approved Farmers List (AFL)- **ANNEX-9**
- Whether organic cultivation is being followed -whether the seeds, pest and weed control, and fertilization correspond to the internal standard-to check parallel and split production practices.
- Measures for Soil erosion have been taken and check, if there is any risk of drift from neighboring fields- buffer zone provision
- Whether- the farmers cultivate non-organic, home consumption crops or cash crops. In this case, he verifies if non-organic products are being used. If the fields with home consumption crops are clearly separated from the organic crop fields.
- In case of deviations from the internal standard, the conditions are noted in the farm inspection report. The internal inspector verifies the quantities that have been sold in the last year and registers the yield estimation for the present harvest. He checks the storage rooms of inputs and of the harvested yield.
- All information is documented on the farm inspection report, which is signed by the internal Inspector and by the farmer (illiterate farmers confirm with fingerprint). Format as per **ANNEX-10**
- At the end of the inspection, a final discussion takes place, in which the deviations and necessary corrective measures are explained.

➤ **YIELDESTIMATES**

This corresponds to clause 5.14 of Chapter 5 of NPOP standards

- This is a very critical area of operation which is vulnerable to manipulations. Utmost care has to be exercised in arriving at the yield estimates as lot of variable factors like climate, environmental factors, soil type, irrigation, use of improved seeds impacts the estimates. The experience and impartial approach of the assessor/inspector determines the accuracy of this estimates.
- A typical estimate of arriving at the yield is carried out before harvest. However, it is only an illustration which can be fine-tuned on a case to case bases to ensure realistic estimates.
- The data is first recorded in the internal inspection report and then handed over to the Project Manager/ICS Manager.
- The yield estimates assume lot of importance as the same is critically evaluated during the external audits by CBs.

➤ **INTERNAL APPROVAL PROCEDURES**

This corresponds to clause 5.12 of Chapter 5 of NPOP standards

- The completed internal inspection reports 100 % Farmers Members of the group are referred either to the internal auditor or to the Organic Approval Committee for their vetting. The verification involves evaluation of all control

- points and is referenced to the previous year records if applicable. The updated farmers diary forms, a pivotal document in the approval process.
- It decides on approval or sanction of each producer and determines the conditions and the duration of the sanctions in office use column given in **ANNEX-11**. Conditions and sanctions are registered in the farm internal inspection report.
- The results of the meeting are summarized in the list of approved and sanctioned farmers. Anyone of the approval committee members will be executing the documents on behalf of approval committee.

6.4 NON-COMPLIANCES AND SANCTIONS

This corresponds to clause 5.15 of Chapter 5 of NPOP standards

- Any farmer violating the internal standards and the standard requirement of NPOP scheme attracts appropriate sanctions and corrective sanctions.
- In tune with the list of nonconformities. The reason and duration of the sanction is noted on the list of sanctioned farmers and the purchase officer is informed accordingly.
- The internal sanction procedure for Non-compliances could differ from group to group but should not exceed the timelines prescribed by CBs. However, the closure of Non-compliances observed during the internal inspection should precede the external audit.
- Normally the CBs categorized the Non compliances as Major (corrective action period limited to 30 days from the audit and minor (90 days from the audit). Besides which is opportunities of improvement (OFIs) are also indicated, wherever required for continual improvement of the control procedures.
- The sanctions ranges from warning, downgrading the organic status, suspensions, termination depending the severity of the non-compliances at non-adherence of stipulated timelines for each sanctions.
- Besides the internal and external CBs sanctions, sanctions can be imposed by accreditation body.
- As in non-compliances the internal procedures are synchronized with those of the CBs. However, the ICS is free to implement a stricter course of action in synch with the standard NPOP requirements.

6.5 TRAINING

This corresponds to clause 5.16 and 5.17 of Chapter 5 of NPOP standards

- Training forms essential requirement to keep the farmers as well as the ICS staff abreast of development related to organic farming and changes in Organic standards.
- The frequency of training should be need based and conducted minimum once a year. It should be conducted as a sign of tokenism. Formats for recording the trainings should contain particulars of topic, venue, name of the trainers and qualifications, attendance of participants with signature and date.
- The efficiency of training is important and will be verified on a random basis during the external audits to gauge the awareness level of organic farming covering both farmers and staff.

- The training faculty should not be limited to in house staff only but should be broad based to include agriculture extension officer, subject matter specialist, Peer farmers of repute, expertise from accreditation bodies.
- All trainings are to be documented as per **ANNEX-12**

6.6 PROCUREMENT PROCEDURE

This corresponds to clause 5.19 of Chapter 5 of NPOP standards

A fool proof procurement procedure galvanizes organic integrity of products across the chain of ICS operations. Ensuring stringent procurement procedure at the ICS level provides for quality and safe product availability for forward linkage activities like processing, trading (both domestic and exports).

The organic industry today is grappling with quality and detection of prohibit inputs due to improper procurement process. ICS which are strong in this area can survive in the long run.

The following steps are required to be inbuilt for having a sound and robust procurement procedure:

- Checking the organic status of the producer by the purchase personnel before purchase
- Segregation of in conversion and organic status of products
- Verifying quantity of the product registered in purchase register
- Cross checking of harvested amount and estimated yield. (In case of doubt, whether the produce is kept separate until clarification received?)
- Issuing a receipt by the purchase officer stating the quantities of the product delivered with date
- Documents maintained for procurement of produce indicating the status of the certified product
- Labeling of Procurement bags properly
- Availability of Digital (pictorial/video graphic) evidence of procurement process
- Availability of Photographs with produce along with the farmers during captured during procurement process.
- To ensure that the Operator is not subcontracting the purchase activities from farmer to the buyer
- Verifying the credentials (legal entity, registration certificate) of Transport operators involved in the transportation of produce.
- Verify the photos or videos of Physical movement of goods captured during loading evidencing that the activity has taken place within the jurisdiction of farmer's/ ICS operational areas to plug

the scope for sourcing of produce from secondary market.

- Care is given to avoid contamination and commingling of organic with conventional crops.

➤ TRACEABILITY OF PRODUCE

- All products procured needs to establish its traceability from the ICS group to the farmers growing area via harvest records and procurement registers. The

traceability needs to be available from the ICS group to the supplier. This to ensure that in the event of any complaint the product can be traced back to the primary stage of production to carry out investigation and determine root cause of the complaint with a view to offer mitigating measures.

- The methodology involves from assigning simple codes to QR codes.

6.7 STORAGE AND HANDLING PROCEDURE

This corresponds to clause 5.19 of Chapter 5 of NPOP standards

Depending on the scale of operation, the ICS may establish collection center in its area of operation or have centralized purchase center. The produce is procured from the members individual storage areas which are maintained hygienically under the supervision of the ICS staff.

The following steps are involved in the storage and handling of produce:

- The produce is primarily stored in fresh gunny/HTPE bags or unused containers and avoid used bags.
- All organic crops are weighed duly calibrated weighting scale and aggregated produce then transported by clean truck which is fully covered.
- The crop of different status (organic, in conversion, and non-organic) is stored in separate storing areas, which are indicated with a label.
- Cleaning of the stores is done with air compressor/sweeping, and if necessary with water. From the warehouse, row crops are taken for processing in lot wise to avoid the risk of commingling.
- All ingress and egress stock movement are to be recorded as per stock register as per **ANNEX-13**.

➤ **WAREHOUSE**

- Wherever ICS establishes warehouses for storage of produce the same has to be covered under certification, with will be verified during external inspection.
- To validate the crop production scope.
- Requirement of warehouse in charge needs to be reflected in the organogram and roles and responsibilities defined.

➤ **MASS BALANCING OF PRODUCE**

- The ICS should have a mechanism to periodically carry out mass balance of its products right from the farmer's level to the ICS level. The exercise involves netting of waste, self-consumption quantity and rejected produce from the produce procured and correlating with the final product dispatched/sold.
- The produce procured should be correlated with the estimated quantity to ensure realistic out puts.

6.8 EXTERNAL INSPECTION AND CERTIFICATION

This corresponds to clause 5.13 of Chapter 5 of NPOP standards

- The external inspection is mandatory to validate the organic status of the product in the shape of issuance of certificate, template if which is prescribed by APEDA which is the scheme owner of NPOP standards.
- The ICS should opt for certification body which is accredited by APEDA in its website after verifying the validity period of the CB.
- The ICS should familiarize with the relevant NPOP standard (available on APEDA website) and acquaint its ICS staff about the same.
- During the external inspection/team of inspectors, the effectiveness of Internal Control System is evaluated on the basis risk assessment generated through trace net system (which is administered by APEDA).
- The ICS shall ensure that the timing of inspection matches or coincides with the availability of standing crops to facilitate its inclusion in the scope of certification.
- The risk levels are classified as low, medium and high. Crops to be certified are categorized as high and low risk crops and subjected to varied treatments.
- During the inspection sampling of crops for residue testing will be undertaken specially the risky crops like Cotton, Soybean, Cumin, Chillies, Amaranths, Psyllium, Sugarcane, Sesame or such other crops which may be categorized as risky from time to time.
- The ICS is requiring to maintain representative samples of products depending on the shelf life for having it tested in case of need at a future date.
- The external inspector re-inspects a certain number of farmers on the basis of certification agency's policy.
- The percentage of external inspection will be determined by the certifier on the basis of a risk assessment. Also the inspector may undertake witness audits; i.e. accompanies the internal inspector to evaluate the effectiveness of their inspections.
- The external inspector compares observations with inspected documents and evaluates the Internal Control System.
- The Internal Control System will certify only after it fulfills the laid down requirements which are sufficient to guarantee that the organic activities of all farmers comply with the internal regulations/standards.
- The observations/findings are notified to the ICS team in a closing meeting which is concluded on the final day of external audit. Recording non-conformities if any raised.
- The ICS is required to comply with NCs within the stipulated timeline indicated by the external auditor and upon its satisfactory closure the scope certificate is issued as per *Clause no 4.4.6.5 of Chapter 4 of NPOP standards*.

6.9 TRACENET

This corresponds to clause 4.5.10 of Chapter 4 of NPOP standards

- It is a unique web based traceable system for use by the registered operators and accredited Certification Bodies under the administration of APEDA. This system provides tamper proof mechanism to establish traceability right from registration and across the chain of operations till the certified product is disposed off.
- Operations starting from registration of operators, recording of approved farmer's details, generation of risk assessment for external audit, stock operations, and generation of scope certificate, transaction certificate and No

- Objection Certificate (NOC) are routed through this trace net system.
- The Operators are provided with User ID and Password by APEDA. As this operation is vital dedicated ICS staff should be assigned this job.

6.10 TRANSACTION CERTIFICATE

This corresponds to clause 4.4.6.5 of Chapter 4 of NPOP standards

It is a certificate issued by the accredited Certification Body to its operator for every sale of his product to the buyer, validating the trade transactions. This certificate addresses the domestic as well as export transactions. All operations right from application to generation of transactions is channelized through the trace net system.

6.11 USE OF LOGO

This corresponds to Chapter 6 of NPOP standards

A trademark – “India Organic” will be granted on the basis of compliance with the National Standards for Organic Production (NSOP). The rules governing the logo are to be stringently followed while displaying the logo, it should be ensured that the prescribed size and color are maintained. Only fully organic status products can display the logo whereas the in conversion products are prohibited. But they can state conversion status on the product.