QUALITY AND PROCESS MANUAL

GROWER GROUP- NOP

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DEFINITIONS AND TERMS

§ 205.1 Meaning of words.
For the purpose of the regulations in this subpart, words in the singular form shall be deemed to impart the plural and vice versa, as the case may demand.

§ 205.2 Terms defined.

Accreditation: A determination made by the Secretary that authorizes a private, foreign, or State entity to conduct certification activities as a certifying agent under this part.

Act: The Organic Foods Production Act of 1990, as amended (7 U.S.C.6501etseq.).

Action level: The limit at or above which the Food and Drug Administration will take legal action against a product to remove it from the market. Action levels are based on unavoidability of the poisonous or deleterious substances and do not represent permissible levels of contamination where it is avoidable.

Administrator: The Administrator for the Agricultural Marketing Service, United States Departure of Agriculture, or the representative to whom authority has been delegated to act in the stead of the Administrator.

Agricultural inputs: All substances or materials used in the production or handling of organic agricultural products.

Agricultural product: Any agricultural commodity or product, whether raw or processed, including any commodity or product derived from livestock, that is marketed in the United States for human or live stock consumption.

Agricultural Marketing Service (AMS): The Agricultural Marketing Service of the United States Department of Agriculture.

Allowed synthetic: A substance that is included on the National List of synthetic substances allowed for use in organic production or handling.

Annual seedling: A plant grown from seed that will complete its life cycle or produce a harvestable yield within the same crop year or season in which it was planted.

Area of operation: The types of operations: crops, live stock, wild-crop harvesting or handling, or any combination thereof that a certifying agent may be accredited to certify under this part.

Audit trail: Documentation that is sufficient to determine the source, transfer of ownership, and transportation of any agricultural product labeled as "100 percent organic," the organic ingredients of any agricultural product labeled as "organic" or "made with organic (specified ingredients)" or the organic ingredients of any agricultural product containing less than 70 percent organic ingredients identified as organic in an ingredients statement.

Biodegradable: Subject to biological decomposition into simpler biochemical or chemical components.

Biodegradable bio based mulch film: A synthetic mulch film that meets the following criteria:
(1) Meets the compostability specifications of one of the following standards: ASTM D6400, ASTM D6868, EN13432, EN 14995, or ISO 17088 (all incorporated byreference;see§205.3);
(2) Demonstrates at least 90% biodegradation absolute or relative to microcrystalline cellulose in less than two years, in soil, according to one of the following test methods: ISO 17556 or ASTM D5988 (both incorporated by reference;see§205.3);and
(3) Must be bio based with content determined using ASTMD 6866(incorporatedbyreference;see§205.3).

Biologics: All viruses, serums, toxins, and analogous products of natural or synthetic origin, such as diagnostics, antitoxins, vaccines, live microorganisms, killed microorganisms, and the antigenic or immunizing components of micro organisms intended for use in the diagnosis, treatment, or prevention of diseases of animals.

Buffer zone: An area located between a certified production operation or portion of a production operation and an adjacent land area that is not maintained under organic management. A buffer zone must be sufficient in size or other features (e.g., windbreaks or a diversion ditch) to prevent the possibility of unintended contact by prohibited substances applied to adjacent land areas with an area that is part of a certified operation.

Bulk: The presentation to consumers at retail sale of an agricultural product in unpackaged, loose form, enabling the consumer to determine the individual pieces, amount, or volume of the product purchased.

Certification or certified: A determination made by a certifying agent that a production or handling operation is incompliance with the Act and the regulations in this part, which is documented by a certificate of organic operation.

Certified operation: A crop or livestock production, wild-crop harvesting or handling operation, or portion of such operation that is certified by an accredited certifying agent as utilizing a system of organic production or handling as described by the Act and the regulations in this part.

Certifying agent: Any entity accredited by the Secretary as a certifying agent for the purpose of certifying a production or handling operation as a certified production or handling operation.

Certifying agent's operation: All sites, facilities, personnel, and records used by a certifying agent to conduct certification activities under the Act and the regulations in this part.

Commercially available: The ability to obtain a production input in an appropriate form, quality, or quantity to fulfill an essential function in a system of organic production or handling, as determined by the certifying agent in the course of reviewing the organic plan.

Commingling: Physical contact between unpackaged organically produced and non organically produced agricultural products during production, processing, transportation, storage or handling, other than during the manufacture of a multiing redient product containing both types of ingredients.

Compost: The product of a managed process through which microorganisms break down plant and animal materials into more available forms suitable for application to the soil.
Compost must be produced through a process that combines plant and animal materials with an initial C:N ratio of between 25:1 and 40:1. Producers using an in-vessel or static aerated pile system must maintain the composting materials at a temperaturebetween131Fand170Ffor3days.
Producers using a windrow system must maintain the composting materials at a temperature between 131 F and170 F for 15 days, during which time, the materials must be turned a minimum of five times.

Control: Any method that reduces or limits damage by populations of pests, weeds, or diseases to levels that do not significantly reduce productivity.

Crop: Pastures, cover crops, green manure crops, catch crops, or any plant or part of a plant intended to be marketed as an agricultural product, fed to livestock, or used in the field to manage nutrients and soil fertility.

Crop residues: The plant parts remaining in a field after the harvest of a crop, which include stalks, stems, leaves, roots, and weeds.

Crop rotation: The practice of alternating the annual crops grown on a specific field in a planned pattern or sequence in successive crop years so that crops of the same species or family are not grown repeatedly without interruption on the same field. Perennial cropping systems employ means such as alley cropping, intercropping, and hedgerows to introduce biological diversity in lieu of crop rotation.

Cultivation: Digging up or cutting the soil to prepare a seedbed; control weeds; aerate the soil; or work organic matter, crop residues, or fertilizers into the soil.

Cultural methods: Methods used to enhance crop health and prevent weed, pest, or disease problems without the use of substances; examples include the selection of appropriate varieties and planting sites; proper timing and density of plantings; irrigation; and extending a growing season by manipulating the microclimate with green houses, cold frames, or windbreaks.

Detectable residue: The amount or presence of chemical residue or sample component that can be reliably observed or found in the sample matrix by current approved analytical methodology.

Disease vectors: Plants or animals that harbor or transmit disease organisms or pathogens which may attack crops or livestock.

Drift: The physical movement of prohibited substances from the intended target site onto an organic operation or portion thereof.

Dry lot: A fenced area that may be covered with concrete, but that has little or novegetative cover.

Dry matter: The amount of a feedstuff remaining after all the free moisture is evaporated out.

Dry matter demand: The expected dry matter intake for a class of animal.

Dry matter intake: Total pounds of all feed, devoid of all moisture, consumed by a class of animals over a given period of time.

Emergency pest or disease treatment program: A mandatory program authorized by a Federal, State, or local agency for the purpose of controlling or eradicating a pest or disease.

Excluded methods: A variety of methods used to genetically modify organisms or influence their growth and development by means that are not possible under natural conditions or processes and are not considered compatible with organic production. Such methods include cell fusion, microencapsulation and macro encapsulation, and recombinant DNA technology (including gene deletion, gene doubling, introducing a foreign gene, and changing the positions of genes when achieved by recombinant DNA technology). Such methods do not include the use of traditional breeding, conjugation, fermentation, hybridization, invitro fertilization, or tissue culture.

Fertilizer: A single or blended substance containing one or more recognized plant nutrient(s) which is used primarily for its plant nutrient content and which is designed for use or claimed to have value in promoting plant growth.

Field: An area of land identified as a discrete unit within a production operation.

Immediate family: The spouse, minor children, or blood relatives who reside in the immediate household of a certifying agent or an employee, inspector, contractor, or other personnel of the certifying agent. For the purpose of this part, the interest of a spouse, minor child, or blood relative who is a resident of the immediate household of a certifying agent or an employee, inspector, contractor, or other personnel of the certifying agent shall be considered to be an interest of the certifying agent or an employee, inspector, contractor, or other personnel of the certifying agent.

Inclement weather: Weather that is violent, or characterized by temperatures (high or low), or characterized by excessive precipitation that can cause physical harm to a given species of livestock. Production yields or growth rates of live stock lower than the maximum achievable do not qualify as physical harm.

Inert ingredient: Any substance (or group of substances with similar chemical structures if designated by the Environmental Protection Agency) other than an active ingredient which is intentionally included in any pesticide product (40CFR152.3(m)).

Information panel: That part of the label of a packaged product that is immediately contiguous to and to the right of the principal display panel as observed by an individual facing the principal display panel, unless another section of the label is designated as the information panel because of package size or other package attributes (e.g., irregular shape with one usable surface).

Ingredient: Any substance used in the preparation of an agricultural product that is still present in the final commercial product as consumed.

Inspection: The act of examining and evaluating the production or handling operation of an applicant for certification or certified operation to determine compliance with the Act and the regulations in this part.

Inspector: Any person retained or used by a certifying agent to conduct inspections of certification applicants or certified production or handling operations.

Label: A display of written, printed, or graphic material on the immediate container of an agricultural product or any such material affixed to any agricultural product or affixed to a bulk container containing an agricultural product, except for package liners or a display of written, printed, or graphic material which contains only information about the weight of the product.

Labeling: All written, printed, or graphic material accompanying an agricultural product at any time or written, printed, or graphic material about the agricultural product displayed at retail stores about the product.

Livestock: Any cattle, sheep, goats, swine, poultry, or equine animals used for food or in the production of food, fiber, feed, or other agricultural-based consumer products; wild or domesticated game; or other non plant life, except such term shall not include aquatic animals for the production of food, fiber, feed, or other agricultural-based consumer products. **Lot**: Any number of containers which contain an agricultural product of the same kind located in the same conveyance, warehouse, or packing house and which are available for inspection at the same time.

Manure: Feces, urine, other excrement, and bedding produced by live stock that has not been composted.

Market information: Any written, printed, audiovisual, or graphic information, including advertising, pamphlets, flyers, catalogues, posters, and signs, distributed, broadcast, or made available outside of retail outlets that are used to assist in the sale or promotion of a product.

Mulch: Any non-synthetic material, such as wood chips, leaves, or straw, or any synthetic material included on the National List for such use, such as newspaper or plastic that serves to suppress weed growth, moderate soil temperature, or conserve soil moisture.

Narrow range oils: Petroleum derivatives, predominately of paraffinic and napthenic fractions with 50 percent boiling point (10mmHg) between415F and440F.

National List: A list of allowed and prohibited substances as provided for in the Act.

National Organic Program(NOP):The program authorized by the Act for the purpose of implementing its provisions.

National Organic Standards Board (NOSB): A board established by the Secretary under7U.S.C.6518toassistin the development of standards for substances to be used inorganic production and to advise the Secretary on any other aspects of the implementation of the National Organic Program.

Natural resources of the operation: The physical, hydrological, and biological features of a production operation, including soil, water, wetlands, woodlands, and wild life.

Nonagricultural substance: A substance that is not a product f agriculture, such as a mineral or a bacterial culture, which is used as an ingredient in an agricultural product. For the purposes of this part, a nonagricultural ingredient also includes any substance, such as gums, citric acid, or pectin, that is extracted from, isolated from, or a fraction of an agricultural product so that the identity of the agricultural product is unrecognizable in the extract, isolate, or fraction.

Nonsynthetic (natural): A substance that is derived from mineral, plant, or animal matter and does not undergo asyntheticprocessasdefinedinsection6502(21)of the Act(7
U.S.C. 6502(21)). For the purposes of this part, non synthetic is used as a synonym for natural as the term is used in the Act.

Nontoxic: Not known to cause any adverse physiological effects in animals, plants, humans, or the environment.

Organic: A labeling term that refers to an agricultural product produced in accordance with the Act and the regulations in this part.

Organic management: Management of a production or handling operation in compliance with all applicable provisions under this part.

Organic matter: The remains, residues, or waste products of any organism.

Organic production: A production system that is managed in accordance with the Act and regulations in this part to respond to site-specific conditions by integrating cultural, biological, and mechanical practices that foster cycling of resources, promote ecological balance, and conserve biodiversity.

Organic system plan: A plan of management of an organic production or handling operation that has been agreed to by the producer or handler and the certifying agent and that includes written plans concerning all aspects of agricultural production or handling described in the Act and the regulations in sub part C of this part.

Peer review panel: A panel of individuals who have expertise in organic production and handling methods and certification procedures and who are appointed by the Administrator to assist in evaluating applicants for accreditation as certifying agents.

Person: An individual, partnership, corporation, association, cooperative, or other entity.

Pesticide: Any substance which alone, in chemical combination, or in any formulation with one or more substances is defined as a pesticide in section 2(u) of the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C.136(u)etseq).

Petition: A request to amend the National List that is submitted by any person in accordance with this part.

Planting stock: Any plant or plant tissue other than annual seedlings but including rhizomes, shoots, leaf or stem cuttings, roots, or tubers, used in plant production or propagation.

Practice standard: The guidelines and requirements through which a production or handling operation implements a required component of its production or handling organic system plan. A practice standard includes a series of allowed and prohibited actions, materials, and conditions to establisha minimum level performance for planning, conducting, and maintaining a function, such as livestock health care or facility pest management, essential to an organic operation.

Principal display panel: That part of a label that is most likely to be displayed, presented, shown, or examined under customary conditions of display for sale.

Private entity: Any domestic or foreign nongovernmental for-profit or not-for-profit organization providing certification services.

Producer: A person who engages in the business of growing or producing food, fiber, feed, and other agricultural-based consumer products.

Production lot number/identifier: Identification of a product based on the production sequence of the product showing the date, time, and place of production used for quality control purposes.

Prohibited substance: A substance the use of which in any aspect of organic production or handling is prohibited or not provided for in the Actor the regulations of this part.

Records: Any information in written, visual, or electronic form that documents the activities undertaken by a producer, handler, or certifying agent to comply with the Act and regulations in this part.

Residual forage: For age cut and left to lie, or windrowed and left to lie, in place in the pasture.

Residue testing: An official or validated analytical procedure that detects, identifies, and measures the presence of chemical substances, their metabolites, or degradation products in or on raw or processed agricultural products.

Responsibly connected: Any person who is a partner, officer, director, holder, manager, or owner of 10 percent or more of the voting stock of an applicant or a recipient of certification or accreditation.

Routine use of parasiticide: The regular, planned, or periodic use of parasiticides.

Secretary: The Secretary of Agriculture or are presentative to whom authority has been delegated to act in the Secretary's stead.

Soil and water quality: Observable indicators of the physical, chemical, or biological condition of soil and water, including the presence of environmental contaminants

Split operation: An operation that produces or handles both organic and nonorganic agricultural products.

Synthetic: A substance that is formulated or manufactured by a chemical process or by a process that chemically changes a substance extracted from naturally occurring plant, animal, or mineral sources, except that such term shallnot apply to substances created by naturally occurring biological processes.

Third-year transitional crop: Crops and forage from land included in the organic system plan of a producer's operation that is not certified organic but is in the third year of organic management and is eligible for organic certification in one year or less.

Tolerance: The maximum legal level of a pesticide chemical residue in or on a raw or processed agricultural commodity or processed food.

Transplant: A seedling which has been removed from its original place of production, transported, and replanted.

Unavoidable residual environmental contamination (UREC): Background levels of naturally occurring or synthetic chemicals that a represent in the soil or present in organically produced agricultural products that are below established tolerances.

GROWER GROUP CERTIFICATION

PREAMBLE

The National Organic Program (NOP)is a regulatory program administrated by United States Department of Agriculture (USDA), housed within the USDA Agricultural Marketing Service (AMS). It is a compilation of Standards for organic production under the egis of USDA, it is based criteria and procedure which is required to be complied by any operator who seeks certification from any accredited Certification Body for exporting countries of the world. It encompasses the USDA Organic Logo and the regulations governing its use. The Organic Foods Production Act, the Preamble to the NOP Final Rule, and sections 205.400- 406 of the USDA organic regulations outline the required steps in the organic certification process.

NOP is a federal regulatory program that develops and enforces consistent national standards for organically produced agricultural products sold in the United States.

NOP also accredits third-party organizations to certify that farms and businesses meet the national organic standards. These certifiers and USDA work together to enforce the standards, ensuring a level playing field for producers and protecting consumer confidence in the integrity of the USDA Organic Seal.

Grower Groups or producers who are desires of seeking certification under NOP should apply many USDA accredited certification body having scope validity.

The USDA organic regulations describe organic agriculture as the application of a set of cultural, biological, and mechanical practices that support the cycling of on-farm resources, promote ecological balance, and conserve biodiversity. These include maintaining or enhancing soil and water quality; conserving wetlands, woodlands, and wildlife; and avoiding use of synthetic fertilizers, sewage sludge, irradiation, and genetic engineering.

Organic producers use natural processes and materials when developing farming systems—these contribute to soil, crop and livestock nutrition, pest and weed management, attainment of production goals, and conservation of biological diversity.

SCOPE

Grower Groups are organized group of farmers /producers who intend to produce organicproducts/engageinorganicprocessesinaccordancewiththeNational Organic Program (NOP).
The producers in the group must apply similar production systems and the farms should be in geographical proximity.

The USDA accredited body requires that the applicant to be certified under NOP be certified under NPOP standards administered by APEDA.

CROP STANDARDS

The organic crop production standards require that:

- Land must have had no prohibited substances applied to it for at least 3 years before the harvest of an organic crop.
- Soil fertility and crop nutrients will be managed through tillage and cultivation practices, crop rotations, and cover crops, supplemented with animal and crop waste materials and allowed synthetic materials.

- Crop pests, weeds, and diseases will be controlled primarily through management practices including physical, mechanical, and biological controls. When these practices are not sufficient, a biological, botanical, or synthetic substance approved for use on the National List may be used.
- Operations must use organic seeds and other planting stock when available.
- The use of genetic engineering, ionizing radiation and sewage sludge is prohibited

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

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 Certification Body. 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. 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 group are to apply to the accredited CB as per APPLICATION FORM of USDA accredited body.

Individual members .of the group are required to apply to the Grower group as per ICS Application form- **FORM- 1 and FORM-2** for ICS contract form of producer with Grower Group

VISION OF ICS

The vision should enumerate long term policies of the grower group (production group) 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 GROWER GROUP

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

PURPOSE OF CERTIFICATION

The National Organic Program (NOP) seeks to establish consistency and best practices in the certification process. This explains the NOP's expectations of accredited certifying agents (certifiers) for completing the certification process according to the U.S. Department of Agriculture (USDA) organic regulations at 7 CFR (Code of Federal Regulations) Part 205.

OVERVIEWOF 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 GROWER GROUP 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. To refer 7 CFR Part 205 Subpart C - Organic Production and Handling Requirements- **Annexure-I** and § 205.202 Land requirements, § 205.203 Soil fertility and crop nutrient management practice standard, § 205.204 Seeds and planting stock practice standard, § 205.205 Crop rotation practice standard, § 205.206 Crop pest, weed, and disease management practice standard **Annexure- II.**

The following areas also should be incorporated while narrating the operational area of the group, correlating with the requirements as stated in **Annexure- I** and **Annexure-II** above.

- Introduction of history and background of 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

TentativeCrop Calendar- Indian Scenario

Months	Activities
May–June	Harvesting,Storage&SellingofZaidcrops&Fieldpreparatio nforcomingkharifseason(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 Rabicrops
February–March–April	Harvesting& storage of Rabicrops
March –April	Field Preparation& Sowing of Zaidcrops

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.

1) LEGAL STATUS

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

2) CONCEPT OF INTERNAL CONTROL SYSTEM

Grower group or ICS is based on Quality Management System within the board contours of USDA NOP requirements which comprise of following:

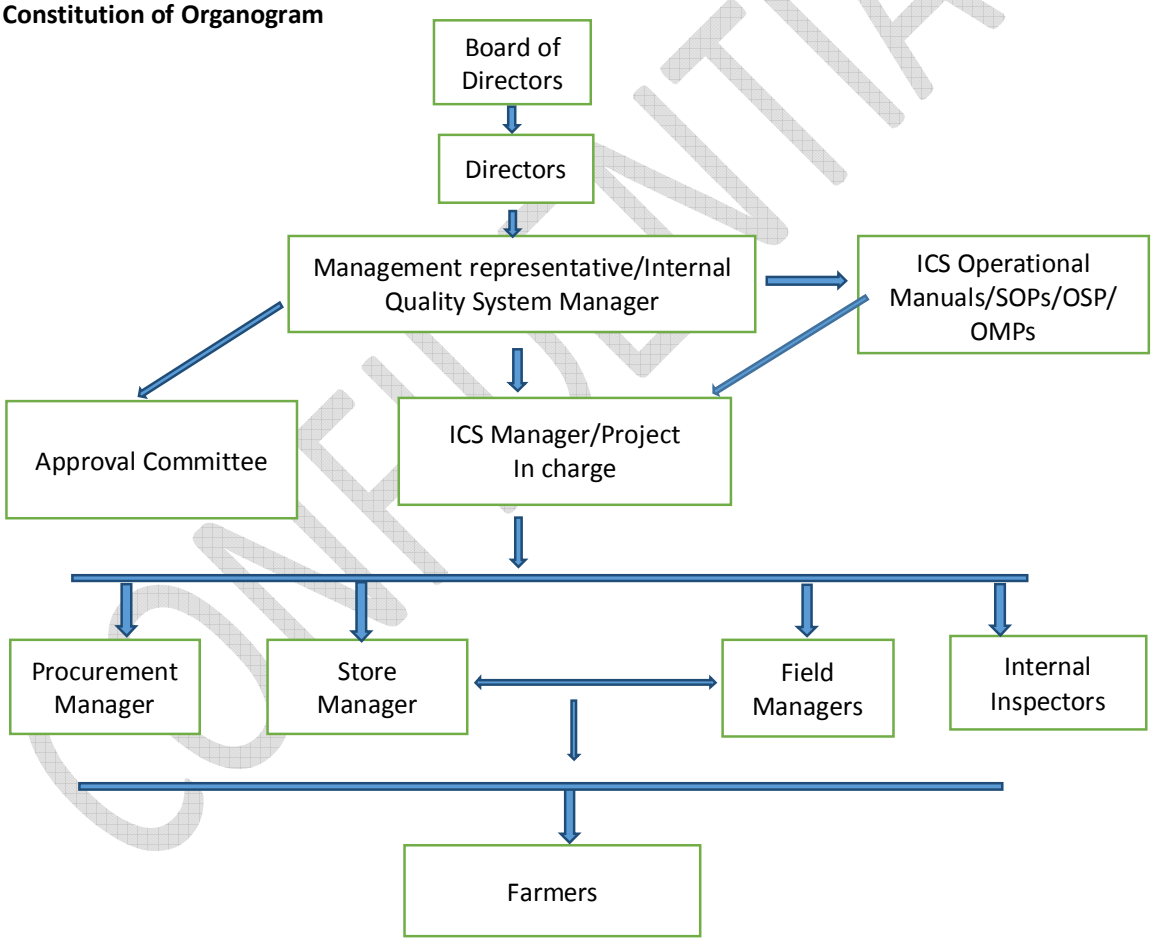
6.1) Implementation of the Internal Quality System
6.2) Internal standard
6.3) Risk assessment

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 Organogram**



➢ **ROLES AND RESPONSIBILITIES OF ICS STAFF**

i) Board of Directors

Overall Incharge 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 screen 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 Incharge

- 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 the information gathered from ICS from grass root label.
- 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 driven the farmer consent in a planned way. Also responsible for crop verification farmer verification and risk identification 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 areforms the producer group. Deletion or addition of farmers takes place from time to time which needs to be intimated by CB.

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

6.2 INTERNAL STANDARD

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. This standard needs to be correlated with the relevant provisions of NOP requirements.

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 elaborated in OSP section under Internal Inspection of Grower. Although this is provided by CB. It forms a prime document which has to be internally addressed. The NOP requirements for formulation of OSP under **§ 205.201 Organic production and handling system plan** are as follows:

An organic system plan must meet the requirements set forth in this section for organic production or handling. An organic production or handling system plan should include:

1) A description of practices and procedures to be performed and maintained, including the frequency with which they will be performed;
2) A list of each substance to be used as a production or handling input, indicating its composition, source, location(s) where it will be used, and documentation of commercial availability, as applicable;
3) A description of the monitoring practices and procedures to be performed and maintained, including the frequency with which they will be performed, to verify that the plan is effectively implemented;
4) A description of the recordkeeping system implemented to comply with the requirements established in § 205.103;
5) A description of the management practices and physical barriers established to prevent commingling of organic and nonorganic products on a split operation and to prevent contact of organic production and handling operations and products with prohibited substances**Annexure-III**F
6) Additional information deemed necessary by the certifying agent to evaluate compliance with the regulations.
7) How to deal with Conversion/ Part conversion/ Parallel production and Split production

6.3 RISK ASSESSMENT (CRITICAL CONTROL POINTS ANALYSIS)

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. Please refer**FORM-5.**

6.3.1 NON APPLICABILTY OFCERTAIN CROP PRODUCTION FACTORS UNDER NOP

The following concepts are not applicable under NOP standards, which implies that only “organic status” farms are eligible for certification

- **Conversion**
- **Part Conversion**
- **Parallel Production**
- **Split Production**

6.3.2 PROCEDURES FOR IMPLEMENTATION OF ICS

- **ENROLLMENT OF NEW FARMERS**

Each new farmer who wishes to be registered as a member needs to apply in Farm Entrance Form/Application farm as per **FORM-1.**
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. The list of farmers approved and other details of respective farmers are recorded as per **FORM-8.**

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
- Vill Abbreviation=

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

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**FORM-6** 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 programmes.

Requirements of § 205.103 Recordkeeping by certified operations- the above stated records should address the following requirements to comply with NOP standards.

- A certified operation must maintain records concerning the production, harvesting, and handling of agricultural products that are or that are intended to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food group(s)).”
- Such records must:
- Be adapted to the particular business that the certified operation is conducting;
- Fully disclose all activities and transactions of the certified operation in sufficient detail as to be readily understood and audited;
- Be maintained for not less than 5 years beyond their creation; and
- Be sufficient to demonstrate compliance with the Act and the regulations in this part.
- The certified operation must make such records available for inspection and copying during normal business hours by authorized representatives of the Secretary, the applicable State program's governing State official, and the certifying agent.

➢ **DOCUMENTS CONTROL**

- 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 documents 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. A typical OSP and OMP comprises of the following areas which needs to be thoroughly addressed by the ICS and any changes in the plan if any should have notified to the concern CB before scheduling the audit.

i. **Overall grower group information-** Location, Legal status, organization of the group, detail of the group and to mention if the group is divided into sub groups, Structure and size of group members (avg all famers of the group below 4 Ha).

ii. **Grower Group Personnel Structure/Organization Chart-** organization chart, position, hierarchies, number of staff and responsibilities of the staff, competences of staff and conflict of interest.

iii. **Grower Group Registration**- Procedure and Provision for registering the group's members and how is the process of inclusion to the group member list/AFL (Registration and Provision for membership to the Group are as follows)

(a) Constitution of the approval committee and its operation. Only those farmers who are willing to stick to the rule and regulation of organic farming shall be allowed to register in the group.

(b) Those farmers who have been practicing traditional system of farming are permitted in register to the group.

(c) **Field History-**Those farmers whose farms have completed full conversion period of 3 years from the last date of application of prohibited material shall also be allowed to register in the group.

(d) An agreement shall be signed between the operator of the ICS and farmer.

(e) Each member should be supplied a copy of Internal Organic Standard (in local language).

(f) The members shall be supplied with list of prohibited inputs.

(g) The members shall be supplied with field record/farm diary.

(h)Registered members should be issued a Code No. card for the identification of the particular member. Village Code and Farmer's code.)

iv. Training-Need based organic training program for group members as well as ICS staff is mandatory requirement.

Training of Staff:

(a) Staff regularly/ annually by a competent trainer/staff.

(b) Date of the training/ list of participants shall be documented.

(c) Date of participation and content of training of all staff need to be documented in staff file.

Training of Farmers:

- Training schedule is planned in the beginning of the season and all farmers are visited regularly by field officers for conducting Internal Inspection and Training purposes as per the planning.
- These advisory visits are documented in the farmers' farm diary and in the field officers. Training report is maintained by field officer which includes date of training, farmers attended the training and content of training.
- Training to the new farmers is important before they are registered to the group, by farm visit by the field officer.
- Training is recorded in farmer diary, filed officer will help them in filling. After completion of Farmer diary, farmer has to submit it to ICS office.

iv. Grower Group Internal Risk Assessment

- Harvest data, and the organic control points and related measures to address these risks and issues that may occur in the functioning of the ICS and related structures. For example, lack of understanding of internal standard and ICS procedures by group members and internal personnel; personnel that frequently change; unclear responsibilities; lack of documentation, especially at purchase, handling and storage points; unclear sanction policy; lack of training.
- Risk assessment and organic integrity (Risk Assessment at the different levels of collection, purchase and storage (processing) as far as the product is under responsibility of the ICS operator. The risk assessment has to be repeated regularly, ideally once a year and whenever there are important changes in operations.

v. Grower Internal Inspections

a. Internal inspection is an important step in certification process. Each group member must be inspected at least twice a year whereby even the minute changes at the field level are noted and compliance for standards is also checked.
b. For internal inspection, a Check List is prepared as per organic standards applicable to the group.
c. The internal Inspector records their observations according to this check list. After the internal inspection is over, inspector signs an exit interview with the member farmer.

Following points must be kept in mind during internal inspection:

- Details of crop and farm activities.
- Seed/planting materials.
- Fertility management inputs.
- Pest, disease and weed management.
- Irrigation management
- Harvest management
- Packing and storage.
- Record of stock and dispatch.
- Action taken on the non-compliances noted during previous inspection.
- The internal inspector submits report Manager and recommendation of internal inspection is included in certification process by Certification Agency.

d. Assign the inspectors, inspection findings, findings of last inspections

vi. Decision Process of Grower Group-

a. Internal decision procedure (Noncompliance: minor and major, sanctions) should form a part of the internal decision procedure.
b. Procedure for action taken and implementation for minor/major non-compliances
c. Mandatory sanction policy. Group members who fail to meet the Production Plan requirements are effectively sanctioned by the ICS and the integrity of the group's organic products is protected. The ICS must impose corrective actions with deadlines for completion if necessary, and to suspend or even exclude group members who do not

comply with the internal organic standard. The group must demonstrate that the implementation of corrective actions is effectively monitored to ensure that non-compliances are satisfactorily resolved.

d. Procedure for deleting noncompliant group members of the list

vii. Production System

Production system of group members organized by the group regarding the following topics: -

- **Crops and common farming Methods-**Member of the group must implement crop rotation practice with legumes, green manure crops, cover crops, catch crops for the following functions
  - maintain or improve soil organic matter content,
  - pest management of annual and perennial crops,
  - management of deficient or excess plant nutrients,
  - control soil erosion.
- Measures to prevent commingling of organic and conventional products and contamination with prohibited substances, or product with different conditions or status to be mentioned wherever applicable.
- Monitoring and identifying the members in conversion period. (conversion, exceptions, etc. as such members shall not qualify for organic status)
- During product handling procedure to be followed by grower group during handling of Product has to check the document to ensure the compliance of NPOP standard. Sampling for residue testing- random testing depends on CB.

viii. Recordkeeping System

Grower Group shall maintain records and relevant supporting documentation such as visual (for example, maps, work-flow charts) concerning inputs and details of their use, production, preparation and transport of organic crops. The grower group shall maintain the organic integrity of products and shall fully record and disclose all activities and transactions in sufficient detail to be easily understood and sufficient to demonstrate compliance with the standard.

Such records must:

- records must be particular area of certified operation
- Full disclosure all activities and transactions of the certified operation in details shall be audited
- maintaining for not less than 5 years beyond their creation, and
- Be sufficient to demonstrate compliance with each Standard.

Records shall make it possible to trace:

a) the origin, nature and quantity of organic products that have been delivered to the production unit or operation,

b) the nature, quantity and consignee of products that have left the production unit;

c) any other information for the purposes of verification, such as the origin, nature and quantity of inputs, ingredients additives, and manufacturing aids delivered to the production unit, and the composition of processed products;

d) activities and processes that demonstrate compliance with this standard.

➢ EXIT PROCEDURE OF MEMBERS FROM GROWER GROUP

- 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 **FORM-7.**
- 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**.**

➢ **INTERNALINSPECTIONS**

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- Refer **FORM-4**
One during Kharif crop.
Second during Rabi crop.

➢ **YIELDESTIMATES**

- 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 based 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.
- Methodology for yield is suggested in **Annexure- IV**

➢ **INTERNAL APPROVAL PROCEDURES**

- 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 **FORM-9**. 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

- 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

- Training forms quintessential requirement to keep the farmers as well as the ICS staff abreast of development related to organic farming and changes in USDA NOP Organic standards. The trainers identified by the ICS should keep himself abreast of the USDA standards by accessing the USDA portal.
- The frequency of training should be need based and conducted minimum once a year. It should be not beconducted 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 **FORM-10**

6.6 PROCUREMENT PROCEDURE

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.

- All ingress and egress stock movement are to be recorded as per stock register.

➢ **TRACEABILTY 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.

➢ **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.
- Stock registered from as per **FORM-11** records details of all products procured based on which the mass balancing is carried out.

6.7EXTERNAL INSPECTION AND CERTIFICATION

- 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 USDA which is the scheme owner of NOP standards.
- The ICS should opt for certification body which is accredited by USDA in its website after verifying the validity period of the CB.
- The ICS should familiarize with the relevant NOP standard (available on USDA websitehttps://www.usda.gov/topics/organic) 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 determined by auditors/NOP accredited CB.
- 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.
- During the inspection sampling of crops for residue testing may be undertaken specially the risky crops like Cotton, Soybean, Cumin, Chilies, Amaranths, Psyllium, Sugarcane, Sesame or such other crops which may be categorized as risky from time to time.
- The sample size and requirement for sampling will be determined by the accredited NOP CB.
- 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.

6.8TRANSACTION CERTIFICATE

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 validates the organic transactions. The TC is issued by NOP accredited CB based on USDA template.

6.9USE OF USDA SEAL

The labeling requirements of the NOP apply to raw, fresh products and processed products that contain organic agricultural ingredients. Agricultural products that are sold, labeled, or represented as organic must be produced and processed in accordance with the NOP standards.

The USDA seal must replicate the form and design of the example in figure 1 and must be printed legibly and conspicuously:

1) On a white background with a brown outer circle and with the term, “USDA,” in green overlaying a white upper semicircle and with the term, “organic,” in white overlaying the green lower half circle; or
2) On a white or transparent background with black outer circle and black “USDA” on a white or transparent upper half of the circle with a contrasting white or transparent “organic” on the black lower half circle.
3) The green or black lower half circle may have four light lines running from left to right and disappearing at the point on the right horizon to resemble a cultivated field.

FORM-1

To,
The ICS Manager
(Quality Manager/Service Provider/Mandator)

Farmer name:	Farmer Code:……
Village name:	
Farmer address& Contact details	*(To be filled by ICS Office)*
Farm(No. of fields including conventional plots)	

Khasra No./GPS No. (similar on field map)	Area in Hectares	Main crop (Rabi)	Inter Crop Rabi)	Main Crop (Kharif)	Inter Crop (Kharif)	List all the inputs used for Organic farming
Total						

Notes on field situation in organic crop	
Organic holding in field with multiple owners, no clear borders	
All owners are organic	
Field is clearly separated from other fields by	
Other:(describe)	

Declaration of the farmer

I, the farmer, declare that the information provided above is correct andthatIhaveunderstoodtheconditionsforOrganicProductionandICSrules and I agree to sign the ICS contract.

Date: Signature of farmer:

Place:

I, the ICS manager, confirm that the above mentioned information is correct.

Date: Signature of the ICS Manager for acceptance

Place:

FORM-2

FARMERSCONTRACTWITHICS

Name of the ICS

and

Farmers name& Code No.

The ICS shall

1. Be responsible for co-ordinating the project and organic certification from an accredited organic certification body.
2. Advise farmers on the organic farming methods and organize farmer training programmes
3. Conduct the internal inspections and approval of organic farmers
4. Buy the organic crop at the prevailing market price plus any possible organic premium (depending on market). The ICS shall make the payments within one week of the purchase of the products from the farmer.
5. Entertain the complaints and appeals of the farmers and do justification with in reasonable time.

The farmer shall:

1. UndertakeorganicfarmingaspertheorganicstandardsoutlinedintheInternalOrganic Standard as well as the Internal Control System (ICS).
2. Not use pesticides, herbicides or synthetic fertilisers on any crop within the certified organic fields.
3. Attend all the training programmes organized by the Internal Control System.
4. Maintain the farm records in the required format.
5. Fulfiltheconditionsenforcedbytheinternalcontrolsystemandtheaccreditedcertifica tionbody.
6. Endeavourtomaintainandimprovetheecosystembynotcuttingtreesandburningorg anic material and littering plastic wastes unnecessarily
7. Sell the certified products to the Internal Control System only.
8. Incaseofanyviolationoftheorganicstandardsintheproject,thesameshallbereported to the ICS.

9. Accept the sanctions prescribed by the ICS incase of violations of the internal standards by the farmer.
10. Shall allow inspections by persons authorized by ICS and the inspector of the accredited Certification Body and give access to the fields, stores and documents.

Farmer	**For ICS**
Signature	Signature
Name:	Name Stamp
Place & Date	Date:

FORM-3

CONFIDENTIALITYOBLIGATIONSANDCONFLICTOFINTERESTDECLARATION

Name o f Employee: Position:

Date of Declaration:

I confirm that I have read the Organic Guidelines *(Indian & International Organic Standards) for Disclosure of Interests and Confidentiality Obligations*.

Other than where I have obtained the prior written approval of the AMIRA PURE FOODS PRIVATE LIMITED, I agree to maintain confidentiality concerning all information made available to me for the purposes of assisting with the business of the AMIRAPURE FOODSPRIVATELIMITED.

This is also to declare that that I have no conflict of interest with any activity of AMIRA Pure Organic Programme that could conflict with the proper performance of my official functions while carrying out the work of the AMIRA pure organic programme.

In the eventa(perceived, potential or actual) conflict of interest exists or arises, I agree that:

- I will identify and discuss that conflict of interest with the AMIRA and will give written declaration in the prescribed format; and
- I will assist the AMIRA in the proper management of that conflict of interest as required, including absenting myself during any deliberation by the AMIRA on the relevant matter, and will not take part in any decision by the AMIRA on the matter.

Conflict with whom	Type of Conflict	Signature

I CERTIFY THAT THIS STATEMENT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Action taken/Comment:

ICS Manager/Project Manager Signature

FORM-4

INTERNAL INSPECTION CHECKLIST

Farmer's name	Farmer ID
Internal Inspector:	Date of Inspection
Village/Taluka/Block:	
Farmer Present during Inspection	

Farm details (all plot , incl. non organic plots)

Total area	Ha
Organic Area	Ha
Number of plots	

Plot No.	**Area**	**Main crops**	**Intercrops**	**Use of Inputs incl. Seeds(last year)** Product, Quantity, Date
TotalPlots				

Checkpoints	**Yes/No/NA**	**Remarks**
Animal Husbandry		
Living condition of the animals on farm are acceptable		
Animals fed with organic or non-organic feed		
No medication without veterinary prescription		
Farm and Farm Management		
Whole farm is managed organically(all crops)		
If also non-organic crops: conventional plots clearly separate from organic plots; storage of Inputs is separate		
If also non-organic crops: organic crop is not grown on non-organic plots (no parallel production)		
Seeds and planting material used		
Farmer trained in organic standards		
Farmer aware of internal organic standard		
General assessment of the farm with regard to sustainability		

Burning of crop residues		
Border and prevention of drift		
Weed control		
Pest Management		
Disease Management		
Prevention of erosion		
Cleanliness of the farm		
Implementation of all required activities		
General assessment of crop		
Yield estimate(list the yield estimate of the Current crops)		
Post Harvest Measures and Processing		
Harvesting(no chemicals used, no co-mingling Of the final produce)		
Processing(only allowed ingredients used, no co-mingling/contamination)		
Storage(no co-mingling/contamination)		
Transportation(no co-mingling/contamination)		

Risk Management

Risk of contamination from	**Low/Med /High**	**Comments**
Neighbouring non-organic fields		
Non-organic activities of same farm		
Industry, motor ways, waste water, etc.		
Others(specify)		

Approval/Recommendations of the internal inspector (whole farm)

Compliance with previous conditions □good □partially/acceptable □missing/not acceptable □no conditions Last year
Compliance this year □to approve without conditions □to approve with conditions □cannot be approved

Comments by internal inspector

Declaration

The farmer here with confirms that he/she has complied with the internal organic standard and has Declared all used inputs activities as stated in this form. The farmer has noted the set conditions.	
Date & Signature Farmer	Date & Signature Internal Inspector

Approval Decision

Compliance this year □approved without conditions □approved with conditions □not approved
Additional conditions or sanctions:
Date & Signature Approval Manager

FORM-5

APF ICS RISK ASSESSMENT REPORT

Name of Project:

Name of Risk Assessor:

Date:

Risk Criteria	Mitigating Measures	Assessment		
		H	M	L
Production Level				
Are all fields actually managed by farmer declared And known to ICS?	Take declaration in Farm entrance form During the registration.			
Are the farmers rotating their crops on changing plots of land?(Shifting cultivation)?	Follow sanction policy, if found violation to internal regulations, give training and check implementation			
Are farmers aware of appropriate organic production methods and confident that organic Farming is suitable for their crops?	Give more trainings and verify the awareness during internal inspection			
Is the source of seed is complying with the standard	Follow sanction policy, if found violation to internal regulations, supply from own seed Bank and give more awareness by trainings			
Is the spraying equipment used for conventional and organic treatments?	Follow sanction policy, if found violation to internal regulations, give more trainings on sharing the equipment's and check implementation			
Could organic fields be contaminated by drift of chemicals or leaching from adjacent on ventional fields?	Follow sanction policy,if found violation to internal regulations, give more trainings on Buffer zone and verify the implementation			
Maintaining the buffer zone	Follow sanction policy, if found violation to internal regulations, give more trainings on Buffer zone and verify the implementation			
Is there parallel production	Follow sanction policy, if found violation to internal regulations, give more trainings on Parallel production and check frequently			
Is there any storage of un-allowed material, is there any chance of contamination the organic produce	Follow sanction policy, if found violation to internal regulations, give more trainings and Check frequently			
Are GMO seeds used (incl. seeds for inter crops)?	Follow sanction policy, if found violation to internal regulations, give more trainings and verify			

Availability of the prohibited material in the region	Follow sanction policy, if found violation to internal regulations, give more training and check			
Any program of govt. which supply/promote of prohibited material to the farmers	Follow sanction policy, if found violation to internal regulations, give more training and Check frequently			
Documentation Level				
Are staff are well competent to the organic Package of practices	Change/replace the staff, give more trainings			
Are there sufficient staffs to realize the field/office Work of the organic project?	Appoint more staff			
All relevant documents which are minimum Required for organic certification are recorded	Analyses the root cause and do the needful And complete the records			
Buying, transport, storing, processing				
Is there price gap between organic and conventional product? (Risk that organic farmers buy from conventional neighbors and sell the Product as organic.)	Train the purchase officer and frequently check the farm by the Extension Officer			
Are the planned measures sufficient to ensure separation of organic and no-organic products During buying, transport, storage & processing?	Check during the buying, transporting, storage, give more training the staff and Record verify			
Is there any chances of contamination during the transport, storage and processing (e.g. pest control In storage, stored un allowed material in storage)	Check during the buying, transporting ,storage, give more training the staff and Record verify			

Risk Level: H=high risk, M=medium risk, L=low risk

Comments:

Sign of Risk Assessor

Comment by Approval Personal:

Signature of approval Committee Date:

FORM-6

FARM DIARY (for ICS)

Year of the Current Crop:

Season: Rabi/Kharif/Annual/Others

Name of the farmer_____Code no._____ Name of the farm Unit_____Address of the Unit _____ _____ Year on which organic production was started by the farmer_____ Date on which farmer joins the ICS _____ Total land (acre)____No. of farms /plots___ Present production technique : Fully chemical /Part organic –split / Part Organic–parallel/ Fully organic/ Others Crops under organic production and their area____Other crops(name and area)_

Certification Status: Registered ICS/ In conversion/Certified/Others
Name of the accredited Certification Body:_____

Farm-Crop-Area Details:

Name of the crop	Area in Hectares	Year and season of production	Method of production(irrigated/non irrigated)	Remarks(organic/ in conversion/others)

Seed & Planting Material:

S. No.	Name of the crop	Variety	Purchase date of seed	Name of Supplier & Address	Type of seed (organic, un treated non organic, treated nonorganic)	Seed Treatment (give details)

Soil Conditioners &Fertility Input Records:

S.No.	Name of farm /plot no	Area	Name of the crop	Name of the inputs	Source of input /brand	Details of application	
						Time	Rate

Disease, Insects, Pests & Weed Management Record:

SNo.	Name of farm /plot no.	Area	Name of the crop	Name of pest, disease and weed	Treatment used for control		Source /brand of input	Rate of application
					Name	Time		

Contamination Control Records:

S.No.	Chances of contamination	Source & Details	Time of contamination control	Contamination management		Remarks
				Prevention	Control	
	Machinery					
	Water					
	Air					
	Neighbor					
	Drift Control &Buffer Zone					
	Others					

Estimates of Production & Harvest Record:

Name of farm /plot &area	Name of the crop /produce	Time of harvest		Estimated production (MT)	Actual production (MT)
		Estimated	Actual		

Marketing and Dispatch Record:

Name of the produce	Quantity of Storage	Details of transport			Quantity Left	Other uses	Remarks
		Date	Quantity	Mode			

FORM 7

APPLICATION FORMAT FOR EXIT OF FARMER FROM ICS

From (Member of Farmer Group under certification) Name……

ID Number …….

Address ……..

To (The ICS Incharge)

…….

……..

……..

Dear Sir,

Sub:- Request letter for exit from ICS

I am not interested to continue with the(name of the grower group) under organic certification for the following reasons

……

……

…… Hence kindly allow me to exit from the grower group during the renewal of certification of this group.

(strike out the below paragraph if not applicable)

Also kindly forward the details of my certification status as on the date of my exit, to

…… who are the new certification body under which I intended to be certified.

Yours faithfully

Date Signature of the farmer

FORM 8

REGISTERRED FARMERS LIST FOR GROUP CERTIFICATION (AFL)

Name and Reg. No. of the ICS		Certification Scheme Opted: NPOP		Date of Filling AFL:		Kharif /Rabi/ Summer/Perenial	Kharif /Rabi/ Summer/Perenial	Kharif /Rabi/ Summer/Perenial
* Note: Farmer Tracenet Code (After Tracenet registration) , Farmer Aadhaar Number & Farmer Mobile Number are Mandatory						Crop Name	Crop Name	Crop Name

Sl. No	*Farmer Tracenet Code	Farmer Name	Farmer Father Name	Gender	Date of Birth	Farmer Aadhar No.*	Farmer Mobile No.*	Village	Hobli	Taluk	District	State	Pincode	Latitude	Longitude	Survey Numbers	Farmer Farm Name	Status of the Farmer (IC1/IC2/IC3/Organic/Inorganic)	Total Area (HA)	Organic Area (HA)	Area (HA)	Estimated yield (MT)	Area (HA)	Estimated yield (MT)	Area (HA)	Estimated yield (MT)

FORM-9

FORMAT FOR SANCTIONS BY ICS

(Letter Head)

To,

(Name of Farmer)……

(ID Number)……..

(Address)…….

List of sanctions and conditions of the approval committee

The following sanctions have been listed by the approval committee based on the internal inspections on xx/xx/xxxx

i) Removal of farmer from the group

ii) Downgrading the organic status to conventional

iii) Sale of farm produce as conventional

The following conditions have to be met by the farmer for maintaining the certification status and continuing with the project

i)…….

ii)…….

iii)…….

You are requested to fulfill the conditions listed at S.No.-------- within xx/xx/xxxx and convey the same to the ICS office. The rest of the conditions have to be fulfilled by the next internal inspections.

You may appeal against the sanctions within a week of receiving this letter. Date :

Place : (For ICS) Signature

(Seal of ICS)

FORM-10

Training Format

1. Name of the Trainer …….. , Qualifications ……..
2. Topic of Training …….. , Dates of Trainings …….
3. Venue of Training ……

Participants List

S.No.	Participants Name	Designation	Signature / Thumb Impression

Signature of the Trainer & Date

FORM-11

Stock Register

Stock statement as on _____						Name of ICS _____				
S. No.	Name of Crop	Season				Stock held in (MT)			Trace net Balance (MT)	Corresponding TC No. if Applicable
		Kharif / Rabi / Summer / Perennial	Kharif / Rabi / Summer / Perennial	Kharif / Rabi / Summer / Perennial	Kharif / Rabi / Summer / Perennial	Opening	Outward	Balance		

Name & Signature of ICS Manager

Date:

NOP Referral Annexures

For detailed reference of standards and certification process kindly visit :-

https://www.ecfr.gov/current/title-7/subtitle-B/chapter-I/subchapter-M/part-205?toc=1

https://www.ams.usda.gov/rules-regulations/organic/handbook

Annexure- I

7 CFR Part 205 Subpart C - Organic Production and Handling Requirements.

§ 205.200 General.

The producer or handler of a production or handling operation intending to sell, label, or represent agricultural products as "100 percent organic," "organic," or "made with organic (specified ingredients or food group(s))" must comply with the applicable provisions of this subpart. Production practices implemented in accordance with this subpart must maintain or improve the natural resources of the operation, including soil and water quality.

Annexure- II

§ 205.202 Land requirements.

Any field or farm parcel from which harvested crops are intended to be sold, labeled, or represented as "organic," must:

a) Have been managed in accordance with the provisions of §§ 205.203 through 205.206;
b) Have had no prohibited substances, as listed in § 205.105, applied to it for a period of 3 years immediately preceding harvest of the crop; and
c) Have distinct, defined boundaries and buffer zones such as runoff diversions to prevent the unintended application of a prohibited substance to the crop or contact with a prohibited substance applied to adjoining land that is not under organic management.

§ 205.203 Soil fertility and crop nutrient management practice standard.

a) The producer must select and implement tillage and cultivation practices that maintain or improve the physical, chemical, and biological condition of soil and minimize soil erosion.
b) The producer must manage crop nutrients and soil fertility through rotations, cover crops, and the application of plant and animal materials.
c) The producer must manage plant and animal materials to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances. Animal and plant materials include:

1. Raw animal manure, which must be composted unless it is:

i. Applied to land used for a crop not intended for human consumption;
ii. Incorporated into the soil not less than 120 days prior to the harvest of a product whose edible portion has direct contact with the soil surface or soil particles; or
iii. Incorporated into the soil not less than 90 days prior to the harvest of a product whose edible portion does not have direct contact with the soil surface or soil particles;

2. Composted plant and animal materials produced though a process that:

i. Established an initial C:N ratio of between 25:1 and 40:1; and
ii. Maintained a temperature of between 131 °F and 170 °F for 3 days using an in-vessel or static aerated pile system; or
iii. Maintained a temperature of between 131 °F and 170 °F for 15 days using a windrow composting system, during which period, the materials must be turned a minimum of five times

3. Un composted plant materials

A producer may manage crop nutrients and soil fertility to maintain or improve soil organic matter content in a manner that does not contribute to contamination of crops, soil, or water by plant nutrients, pathogenic organisms, heavy metals, or residues of prohibited substances by applying:

1) A crop nutrient or soil amendment included on the National List of synthetic substances allowed for use in organic crop production;
2) A mined substance of low solubility;
3) A mined substance of high solubility: Provided, That, the substance is used in compliance with the conditions established on the National List of non synthetic materials prohibited for crop production;
4) Ash obtained from the burning of a plant or animal material, except as prohibited in paragraph (e) of this section: Provided, That, the material burned has not been treated or combined with a prohibited substance or the ash is not included on the National List of nonsynthetic substances prohibited for use in organic crop production; and
5) A plant or animal material that has been chemically altered by a manufacturing process: Provided, That, the material is included on the National List of synthetic substances allowed for use in or ganic crop production established in § 205.601.

The producer must not use:

1) Any fertilizer or composted plant and animal material that contains a synthetic substance not included on the National List of synthetic substances allowed for use in organic crop production;
2) Sewage sludge (bio solids) as defined in 40 CFR part 503; and
3) Burning as a means of disposal for crop residues produced on the operation: Except, That, burning may be used to suppress the spread of disease or to stimulate seed germination.

§ 205.204 Seeds and planting stock practice standard.

1) The producer must use organically grown seeds, annual seedlings, and planting stock: Except, That, Non organically produced, untreated seeds and planting stock may be used to produce an organic crop when an equivalent organically produced variety is not commercially available: Except, That, organically produced seed must be used for the production of edible sprouts;
2) Non organically produced seeds and planting stock that have been treated with a substance included on the National List of synthetic substances allowed for use in organic crop production may be used to produce an organic crop when an equivalent organically produced or untreated variety is not commercially available;
3) Non organically produced annual seedlings may be used to produce an organic crop when a temporary variance has been granted in accordance with § 205.290(a)(2);
4) Non organically produced planting stock to be used to produce a perennial crop may be sold, labeled, or represented as organically produced only after the planting stock has been maintained under a system of organic management for a period of no less than 1 year; and

5) Seeds, annual seedlings, and planting stock treated with prohibited substances may be used to produce an organic crop when the application of the materials is a requirement of Federal or State phytosanitary regulations.

§ 205.205 Crop rotation practice standard.

The producer must implement a crop rotation including but not limited to sod, cover crops, green manure crops, and catch crops that provide the following functions that are applicable to the operation:

a) Maintain or improve soil organic matter content;
b) Provide for pest management in annual and perennial crops;
c) Manage deficient or excess plant nutrients; and
d) Provide erosion control.

§ 205.206 Crop pest, weed, and disease management practice standard.

a) The producer must use management practices to prevent crop pests, weeds, and diseases including but not limited to:

    1) Crop rotation and soil and crop nutrient management practices, as provided for in §§ 205.203 and 205.205;
    2) Sanitation measures to remove disease vectors, weed seeds, and habitat for pest organisms; and
    3) Cultural practices that enhance crop health, including selection of plant species and varieties with regard to suitability to site-specific conditions and resistance to prevalent pests, weeds, and diseases.

b) Pest problems may be controlled through mechanical or physical methods including but not limited to:

    1) Augmentation or introduction of predators or parasites of the pest species;
    2) Development of habitat for natural enemies of pests;
    3) Non-synthetic controls such as lures, traps, and repellents.

c) Weed problems may be controlled through:

    1) Mulching with fully biodegradable materials; Mowing;
    2) Livestock grazing;
    3) Hand weeding and mechanical cultivation;
    4) Flame, heat, or electrical means; or
    5) Plastic or other synthetic mulches: Provided, That, they are removed from the field at the end of the growing or harvest season.

d) Disease problems may be controlled through:

1) Management practices which suppress the spread of disease organisms; or Application of
2) Non-synthetic biological, botanical, or mineral inputs.

e) When the practices provided for in paragraphs (a) through (d) of this section are insufficient to prevent or control crop pests, weeds, and diseases, a biological or botanical substance or a substance included on the National List of synthetic substances allowed for use in organic crop production may be applied to prevent, suppress, or control pests, weeds, or diseases: Provided, That, the conditions for using the substance are documented in the organic system plan.

f) The producer must not use lumber treated with arsenate or other prohibited materials for new installations or replacement purposes in contact with soil or livestock.

Annexure- III

THE NATIONAL LIST OF ALLOWED AND PROHIBITED SUBSTANCES

§ 205.600 Evaluation criteria for allowed and prohibited substances, methods, and ingredients.

The following criteria will be utilized in the evaluation of substances or ingredients for the organic production and handling sections of the National List:

(a) Synthetic and non synthetic substances considered for inclusion on or deletion from the National List of allowed and prohibited substances will be evaluated using the criteria specified in the Act (7 U.S.C. 6517 and 6518).
(b) In addition to the criteria set forth in the Act, any synthetic substance used as a processing aid or adjuvant will be evaluated against the following criteria:
(c) The substance cannot be produced from a natural source and there are no organic substitutes;
(d) The substance's manufacture, use, and disposal do not have adverse effects on the environment and are done in a manner compatible with organic handling;
(e) The nutritional quality of the food is maintained when the substance is used, and the substance, itself, or its breakdown products do not have an adverse effect on human health as defined by applicable Federal regulations;
(f) The substance's primary use is not as a preservative or to recreate or improve flavors, colors, textures, or nutritive value lost during processing, except where the replacement of nutrients is required by law;
(g) The substance is listed as generally recognized as safe (GRAS) by Food and Drug Administration (FDA) when used in accordance with FDA's good manufacturing practices (GMP) and contains no residues of heavy metals or other contaminants in excess of tolerances set by FDA; and
(h) The substance is essential for the handling of organically produced agricultural products.
(i) Non synthetics used in organic processing will be evaluated using the criteria specified in the Act (7 U.S.C. 6517 and 6518).

§ 205.601 Synthetic substances allowed for use in organic crop production.

In accordance with restrictions specified in this section, **the following synthetic substances may be used in organic crop production: Provided, That, use of such substances do not contribute to contamination of crops, soil, or water.**

Substances allowed by this section, except disinfectants and sanitizers in paragraph (a) and those substances in paragraphs (c), (j), (k), and (l) of this section, may only be used when the provisions set forth in § 205.206 (a) through(d)prove insufficient to prevent or control the target pest.

(a) As algicide, disinfectants, and sanitizer, including irrigation system cleaning systems.

1. Alcohols.
2. Ethanol.
3. Isopropanol.

Chlorine materials - For preharvest use, residual chlorine levels in the water in direct crop contact or as water from cleaning irrigation systems applied to soil must not exceed the maximum residual disinfectant limit under the Safe Drinking Water Act, except that chlorine products may be used in edible sprout production according to EPA label directions.

1. Calcium hypochlorite.
2. Chlorine dioxide.
3. Hypochlorous acid—generated from electrolyzed water.
4. Potassium hypochlorite—for use in water for irrigation purposes.
5. Sodium hypochlorite.

Copper sulfate--for use as an algicide in aquatic rice systems, is limited to one application per field during any 24-month period. Application rates are limited to those which do not increase baseline soil test values for copper over a timeframe agreed upon by the producer and accredited certifying agent.

1. Hydrogen peroxide.
2. Ozone gas--for use as an irrigation system cleaner only.
3. Peracetic acid--for use in disinfecting equipment, seed, and asexually propagated planting material. Also permitted in hydrogen peroxide formulations as allowed in § 205.601(a) at concentration of no more than 6% as indicated on the pesticide product label.
4. Soap-based algicide/demossers.
5. Sodium carbonate peroxyhydrate

(CAS #–15630–89–4)—Federal law restricts the use of this substance in food crop production to approved food uses identified on the product label.

1. As herbicides, weed barriers, as applicable.
2. Herbicides, soap-based - for use in farmstead maintenance (roadways, ditches, right of ways, building perimeters) and ornamental crops.
3. Mulches.
4. Newspaper or other recycled paper, without glossy or colored inks.
5. Plastic mulch and covers (petroleum-based other than polyvinyl chloride (PVC)).
6. Biodegradable bio based mulch film as defined in

58663, Sept. 30, 2014; 80 FR 77234, Dec. 14, 2015; 82 FR 31243, July 6, 2017; 83 FR 66571, Dec. 27, 2018; 84 FR 56677, Oct. 23, 2019; 87-FR-10930, February 28, 2022; 87 FR 16371, March 23, 2022]

§ 205.602 Non synthetic substances prohibited for use in organic crop production.

The following non synthetic substances may not be used in organic crop production:

1. Ash from manure burning.

2. Arsenic.
3. Calcium chloride, brine process is natural and prohibited for use except as a foliar spray to treat a physiological disorder associated with calcium uptake.
4. Lead salts.
5. Potassium chloride - unless derived from a mined source and applied in a manner that minimizes chloride accumulation in the soil.
6. Rotenone (CAS # 83-79-4).
7. Sodium fluo aluminate (mined).
8. Sodium nitrate - unless use is restricted to no more than 20% of the crop's total nitrogen requirement; use in spirulina production is unrestricted until October 21, 2005.
9. Strychnine.
10. Tobacco dust (nicotine sulfate).

[68 FR 61992, Oct. 31, 2003, as amended at 83 FR 66572, Dec. 27, 2018]

Annexure IV

As per USDA National Organic Program, 7 CFR §§ 205; 205.2 and USDA AMS NOP, National Organic Program Handbook

Conducting Yield Analysis

- The Conducting Yield Analysis course provides instruction on how to complete and evaluate a yield analysis for U.S.- and non-U.S.-based operations. It introduces the concepts and research that underpin yield analysis and teaches how to apply these concepts through hands-on exercises. The course explains potential outcomes of yield analysis and provides a framework for evaluating results, with a discussion of caveats and considerations. Finally, the course recommends best practices for documenting yield analysis, which is essential when determining a course of action for operations that may have violated the organic regulations.

Yield Analysis Concepts and Impact

- Yield analysis is an important tool for assessing organic crop farms. It is a quantitative tool that is used to determine feasible crop yields for a farm in a specific geographic area. Yield analysis helps certifiers to determine if the farm has enough certified organic area to produce the amount of product that was harvested and sold as organic. Yield analysis can also help certifiers to detect fraud at farms. By finding fraud at the beginning of the supply chain, certifiers can remove a fraudulent product from the organic market before it becomes more difficult to trace. It is also important to understand how organic yields compare to conventional yields, as the comparison allows the NOP and certifiers to conduct the analysis, even when organic yield data are limited.

Conducting Yield Analysis in Four Steps

- The first step in yield analysis is to define the scope of the analysis by identifying the crop(s) of interest and geographic area where the certified farm, or applicant for certification, is located. The second step is to gather data on reported organic yield from the farm and the organic yield baseline for the crop and geographic area. The third step is to calculate the organic yield ratio, and the fourth and final step is to compare the organic yield ratio to one (1).
- Considerations and Evaluation of Yield Analysis
  Certifiers should fully document the yield analysis process and results and include them in a farm's certification file, just like other investigative activities. After completing yield analysis, consider factors that may have influenced crop yields on the farm. A high yield ratio should trigger further investigation. When creating an investigative plan, certifiers should consider the different scenarios that may lead to an unusually high yield. Certifiers are responsible for developing and implementing a plan to ensure that certified farms comply with the organic regulations. This effort may require ongoing, enhanced oversight of farms that report high yields.