

Organic NOP

Name of the Organization
(As an example, mentioned as ABC throughout this Document)

Organization Logo

QUALITY MANAGEMENT SYSTEMS PROCEDURES (QMSP)

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Disclaimer: Please note that these procedures are prepared for your guidance in generic form to the best of our judgment taking into consideration, the requirements of IndG.A.P standard, organization quality management system that is to be put in place as we understood. You are advised to go through the IndG.A.P standard requirements as applicable to your scope by visiting the scheme owner website (www.qcin.org). We are not responsible for any consequences that may arise due to implementation of the procedures.

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1. 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 form 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 its 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, field 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.

2. 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.

➤ INTERNAL INSPECTIONS

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.

➤ YIELD ESTIMATES

- 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.

3. 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.

➤ **TRACEABILITY OF PRODUCE**

- All products procured needs to establish its traceability from the ICS group to the farmers growing area via harvest records and procurement registers. The traceability needs to be available from the ICS group to the supplier. This to ensure that in the event of any complaint the product can be traced back to the primary stage of production to carry out investigation and determine root cause of the complaint with a view to offer mitigating measures.
- The methodology involves from assigning simple codes to QR codes.

➤ **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.