

## **OneCert Grower Group Policy**

### **1. Purpose:**

The OneCert Grower Group Policy details the requirements for certification of a group of small landholding farmers that are organized under one management and marketing system and have practices that are uniform within the group. The contents of the OneCert Grower Group Policy are taken from the NOSB Recommendations for group certification, see Point 4.6. References below.

### **2. Scope:**

The OneCert Grower Group Policy provides the requirements of group certification to potential and existing clients along with guidance to OneCert staff.

### **3. Background:**

Grower group certification refers to the certification of a group of producers (production units, sites, and/or facilities) that are organized as a “person” as defined in 7 CFR 205.2.<sup>1</sup> It has historically been used for the certification of cooperatives or groupings of small landholders located in a geographical or social region, whose crops are marketed collectively. The grower group must be organized under one management and marketing system and have practices that are uniform within the group.

### **4. Policy:**

#### **4.1. Group Organization:**

Group members must be organized into production units based on crops grown, production practices, harvest schedules, centralized processing/distribution, geographic proximity, distance, and use of a common recordkeeping system. The production unit, site, and/or facility is considered the measurement unit of the operation that is subject to annual inspections.<sup>1</sup> The ICS may choose to limit the number of members or sub-units that are included in a production unit. The limiting factor should be based on the feasibility of effective oversight by ICS personnel and factors such as size and accessibility of the sub-units.<sup>1</sup> OneCert will determine whether the distance of each production unit meets the requirements of group certification.

A group may be organized on itself, i.e. as a co-operative, or as a structured group of producers affiliated to a processor or an exporter.

Group members must utilize a common post-harvesting handling system. Post-harvest handling includes activities such as washing, cleaning, sorting, packing, cooling, storing of raw agricultural products, and facility pest management.<sup>4</sup> Group members must also have centralized processing, distribution, and marketing facilities and systems that must be inspected by OneCert each year. Any processing that changes the original form of the product such as chopping, peeling, cutting, waxing, coating, drying, or combining with other ingredients is considered handling and requires a separate Handling Organic System Plan.

The annual inspection includes direct inspection of sub-units of a production unit based on both risk assessment and random sampling.<sup>1</sup> The selection of the inspected sub-units is referenced in the OneCert Grower Group Inspection Policy.

Those group members that do not meet the above requirements should be excluded from the group or consolidated into a new grower group that shares similar practices and geographic proximity.

#### **4.2. Group participation:**

Participation in the grower group is based on the group organization as indicated above.

Participation in the grower group is limited to those group members who market their organic production only through the group.<sup>1</sup> Additional workers, such as family members or other group members, are

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allowed to provide labor during production activities throughout the season. Use of hired workers along with other than family or group members or farmer to provide labor during production activities throughout the season is allowed. However, if a landowner is only using hired workers then that landowner should be excluded from the group.

Individual group members may market their product as nonorganic outside of the group but must maintain all sales documentation of such transactions or sales activity. All sales must be reported to the ICS and the ICS must maintain complete documentation of organic crop harvest and sales and nonorganic crop harvest and sales.

Individual certification of a group member beyond the grower group is not allowed. If a grower has their own certification outside of the group, there is no need for certification as a group member and that grower should be excluded from the group certification.

### **4.3. Internal Control System:**

The Internal Control System (ICS) must maintain all documentation of the group members and facilities, including an ICS Manual, OSP, production plans, materials used and rate of applications, harvest records, contractual agreements with each group member, and internal inspection reports.

#### **A. Internal Control System Manual:**

The ICS Manual must include a description of the sub-units and facilities, farming practices, materials used and rates of application, harvest records, contractual arrangement with each individual member, and internal inspection reports. The ICS Manual shall reflect the group's characteristics, internal policies, and procedures employed by the group. The manual must provide a meaningful description of the group's structure and functioning of the ICS.

The ICS Manual must include the following points:

- Contact details - The contact details must provide the name, address and contact person of the legal entity applying for certification, the personnel responsible for overseeing and implementing the ICS structure, and all site managers responsible for the day-to-day compliance.
- Group organization - Provide a description of the production unit(s) and number of group members per production unit(s).
- Membership agreement/contract - The agreement/contract may be included as part of the ICS Manual or attached separately. The agreement/contract must detail the group members commitment to meet the requirements specified for compliance to the group's internal standard and USDA organic regulation.
- Production system overview - Provide a general overview of the production system of group members including, but not limited to, structure and size of group members (average, smallest and largest sub-unit), crops and common farming methods.

Note: The ICS Manual must provide details on all farming practices and crops grown - including those grown for own consumption or to be sold as non-organic.

- Internal product flow and handling flow - Provide a description of all the steps from harvest until final sale. This description should include post-harvest handling procedures, logistics, collection, sorting, processing, labeling, and packaging until final sale. All ICS personnel and facilities involved in the processing and storage of organic product must also be included.

#### **B. Internal Control System Personnel:**

The ICS personnel must have clear roles and responsibilities and be provided the resources and training to fulfill their roles and responsibilities. The ICS personnel team may include, but is not limited to: field

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advisors, internal inspectors, an internal evaluation committee, a director of ICS, a director of training and capacity building, a marketing officer, a procurement officer, and any other applicable personnel.<sup>1</sup>

The ICS personnel must possess the following qualifications:<sup>1</sup>

- Be fluent in the local language and dialect of the group members.
- Appoint person who is fluent in the English language.
- Possess the ability to read and write and report in the chosen ICS language.
- Be well versed in the National Organic Program, especially in the sections of the regulation that relate to the sub-units and members, sites or facilities that they review.
- Be familiar with the local agricultural production systems.
- Be familiar with the principles and practice of organic agriculture.
- Be familiar with the principles and practices of organic post-harvest handling.
- Be able to demonstrate competence in internal control procedures and an understanding of the internal regulations.

The ICS must develop an organizational chart to provide a clear picture of how the various duties are divided among the ICS staff and to identify the structure among personnel.

The ICS must maintain all staff documentation including resume, confidentiality, conflict of interest, training, and any other relevant personnel document. All confidentiality and conflict of interest forms must be updated annually and available at the time of the audit conducted by OneCert.

### **C. Conflict of Interest:**

The ICS must have have a policy to ensure that duties performed by the ICS personnel are not influenced by any conflict of interest that the personnel may have. The group's conflict of interest policy shall provide guidance to make personnel aware of possible conflict of interest situations.

For example:

- Any direct or indirect family or business relationship between ICS personnel and a group member(s).
- Any economic dependencies (e.g. resulting from a current or past employment relationship) between ICS personnel and a group member(s).
- When the internal inspection and verification of those results are performed by the same personnel.

### **D. Internal Organic Standards:**

The Internal Organic Standard is the reference standard for conducting the internal inspection and verification of group members. The group's Internal Organic Standard must be based on USDA organic regulations. The Internal Organic Standard defines the production rules all group members are committed to and explains the production practices applied by group members.

The Internal Organic Standards should include a description of the production practices commonly applied by group members detailing the following:

- Crops to be grown
- Conversion requirements and procedures for accepting new group members
- Production rules including accepted pest, weed and disease control measures, and soil fertility practices
- Source of seeds, annual seedlings or planting stock
- Instructions for accepted harvest and post-harvest-procedures

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The Internal Organic Standards must address the measures taken to prevent commingling of organic and conventional products and contamination with prohibited substances. In the case of split or parallel production additional requirements for preventing commingling must be provided, including:

- Product identification.
- Established buffer zones between organic and conventional fields/sites to avoid contamination with prohibited substances.
- Additional measures required to prevent drift.
- Clear instructions for separation of organic and conventional produce during production, harvest and post-harvest (ex. drying, bundling, transport, and storage).
- All sites (organic and conventional) must be disclosed in the Organic System Plan and are subject to internal inspection by the ICS and OneCert. Records must be maintained for all crops grown, including those grown for own consumption or to be sold as non-organic.

The Internal Organic Standards must indicate the process the ICS completes to submit new input requests to OneCert for approval. The ICS must provide a list of approved input materials to all group members.

The Internal Organic Standards must include the decision making procedures used and application of sanctions to individual members who do not comply with the organization's OSP, the NOP, EC, and/or other applicable standards.<sup>1</sup> Irregularities and minor noncompliances found during internal audits must be informed to the group member along with the corrective actions imposed. The ICS and group member must agree upon a time for the corrective actions to be submitted and/or completed.

The ICS staff must inform OneCert of any irregularities and minor noncompliances found during internal audits and the sanctions taken.

The ICS must take it upon themselves to provide a corrective action plan to any group member(s) or sub-unit(s) that are suspended or excluded from the group. This corrective action plan must be implemented by the group member(s) or sub-unit(s) prior to being readmitted into the group. The ICS must inform OneCert of all violations made by group member(s) or sub-unit(s) that violate the NOP, EC, or any other applicable standards. The ICS must also inform OneCert of the corrective actions taken by the group member(s) or sub-unit(s). Those group member(s) or sub-unit(s) that have been suspended or excluded from the group should not be permitted to rejoin the group until OneCert approves the measures taken to ensure that the violation is not repeated.

### **E. Group Member Registration:**

The ICS must establish procedures for registering its group members to ensure that the ICS and assigned internal inspectors are able to conduct internal inspections of each group member. A contractual agreements with each group member should be completed that detail the group members commitment to meet the requirements specified for compliance to the group's' internal standard and USDA organic regulation. The following group member information must be collected and documented:

- General information including the name of person(s) responsible for production, address (or village) and any other details to locate the group member, telephone numbers, and the group member allocation to the specific production unit if the group organizes more than one production units.
- Information on the agricultural production area including registered fields and facilities under the group member's management, including the non-organic fields, crops under the group's common marketing and any other crops produced by the group member for other purposes (e.g. for own consumption or local markets), cultivation practices and the management history (date of last application with prohibited substances) of each field, and the total area and area of crop's to be approved for the group's common marketing.

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- A field map must be provided to show where the respective fields are located to ensure that internal or external inspectors can find them. The fields must be numbered according to the number represented in the group member's field register where the field management history is also documented.
- A risk assessment must address whether there are any potential negative impacts from neighboring fields which are not managed organically.

The field staff should conduct separate registration visits before the first internal inspections take place. After the information, documents, and field visits are completed the group member details are added to the registered list of group members and the member can undergo the regular ICS procedures.

The inclusion of a new group member to the registered list of group members must be approved by OneCert at time of annual inspection.

### **F. Internal Inspections:**

Internal inspections must be conducted by the field officers/internal inspector(s) at least once per year and include a visit to all fields and facilities under the surveillance of the ICS. There should be a minimum of one field officer per maximum of 500 farmers.<sup>2</sup>

The internal inspectors must complete a report, identify any noncompliances and issues of concern, and submit the report to the ICS manager. The report is then evaluated and sanctions are given to violators as applicable. The ICS manager must inform OneCert of any noncompliances issued to growers during that year.

### **G. Training Requirements for ICS Personnel and Group Members:**

All ICS personnel must undergo training that details the technical aspects on how to conduct internal inspection and verification, the respective OSP and internal production standard requirements, and all applicable standards the group is certified to. Training shall take place a minimum of once a year.<sup>1</sup> More frequent training may be necessary if standards or certification requirements are revised. The ICS personnel responsible for training and capacity building shall organize an external training for ICS internal personnel conducted by outside certification experts at least once a year.<sup>1</sup>

All group members should be trained by the field advisor or other competent ICS staff on how to implement the internal organic standard and organic farming practices. Group members may be trained collectively during membership assemblies or on an individual basis. Individual training is important to ensure that each group member's situation, concerns or other issues are addressed.

All trainings for ICS personnel and group members, including participation and content, must be documented and available for review by OneCert.

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### **4.5 Definitions:**

**Geographic Proximity:** Growers must be in the same administrative region (country, district, state) with access to the same collection or post-harvest handling facility, and/or common soils, water source, slope, topography or other physical features.

**Group member:** a producer/farmer who owns and manages land.

**Group processing unit:** A unit which is managed either by the group (ex. cooperative processing) or processing unit at a group member's farm. This processing unit is used by all the group members and is under supervision of ICS.

**Internal Control System(ICS):** A written quality assurance system included in a master Organic System Plan that sets forth the practice standards, recordkeeping and audit trail requirements applicable at each production unit, facility or site that identifies the internal verification methods used<sup>1</sup> to maintain compliance to the NOP, EC and/or other applicable standard .

**Internal Organic Standards:** The guidelines and requirements outlined by the ICS to which the group members must follow.

**Handle:** To sell, process, or package agricultural products, except such term shall not include the sale, transportation, or delivery of crops or livestock by the producer thereof to a handler.<sup>3</sup>

**Handler:** Any person engaged in the business of handling agricultural products, including producers who handle crops or livestock of their own production, except such term shall not include final retailers of agricultural products that do not process agricultural products.<sup>3</sup>

**Handling operation:** Any operation or portion of an operation (except final retailers of agricultural products that do not process agricultural products) that receives or otherwise acquires agricultural products and processes, packages, or stores such products.<sup>3</sup>

**Person:** An individual, partnership, corporation, association, cooperative, or other entity.<sup>3</sup>

**Post-harvesting system:** The act of handling raw agricultural commodities without further processing. Post-harvest handling activities preserve the essential form of the product and may include, but are not limited to: flotation, washing, sanitizing, cooling, packing, separation from foreign objects or plant parts (ex. cleaning grain), removal of stems leaves or husks, and storage and pest control practices.<sup>4</sup>

**Processing:** Cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container.<sup>3</sup>

**Production Unit:** The portion of an organic operation, including sub-units where products are produced and/or handled that are located within geographic proximity.<sup>1</sup>

**Site:** The location of management activities for a given production unit.<sup>1</sup>

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**Sub-unit:** A smaller discrete portion of a production unit, such as a field, plot, wild-crop harvest area, or distinct processing area.<sup>1</sup>

### **4.6 References:**

1. [NOSB Recommendation - November 19, 2008, "Certifying Operations with Multiple Production Units, Sites, and Facilities under the National Organic Program"](#)
2. [NOSB Recommendation - October 20, 2002, "Criteria for Certification of Grower Groups"](#)
3. [7 CFR §205.2 Terms defined.](#)
4. [NOP 5023: Guidance - Substances Used in Post-Harvest Handling of Organic Products](#)