Organic producers' group certification Step by step



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Objectives

We made this guide to provide you with all necessary information about the organic producers' groups certification process.

Applicable standards are available on IBD website, or upon request.

This guide complements the Organic Products certification Step by Step guide, and focuses exclusively on the group certification category.

Prerequisites for producers' groups certification

To request the group certification, the producers' group must meet the following prerequisites:

Constitution

The group may be organized as such, for example as cooperative or association, or as a structured group of producers affiliated to a processor or an exporter.

The group must be established formally based on written agreement with its members, to define the group and its internal control system responsibility, and have legal capacity.

These agreements must contain the commitment of each producer to fulfilling the current technical regulations and allowing the performance of the internal control, the certification body and the control or accreditation body inspections.

Productive profile

Producers must have similar production systems with regards to size, products, inputs, technology and records system.

Producers with significantly larger areas than the average of the group and distinctive technology must be certified individually.

The processing and marketing units of the group may be part of the certification scope, but must be inspected annually by the certification body.

Members' location

Producers must be located in geographical proximity, normally within the same municipality or micro-region.

Marketing channels

The producers group must have coordinated management and use the same processing and marketing units.

The certified entity is the group as a whole, so members cannot use the certification individually, selling their production outside of the channels established by the group (except when selling products certified against the Brazilian system).

Internal Control System

The group must have sufficient organization and structure to ensure an efficient and documented Internal Control System (ICS) that guarantees the fulfillment of the production and certification requirements by its members.

The Internal Control System (ICS)

The Internal Control System (ICS) is a documented quality assurance system that ensures – by means of its procedures, inspections and records – the fulfillment of certification requirements by the producers.

Group members follow the same Organic Management Plan, and the ICS must control the implementation of this plan, in order to guarantee the production's organic quality and the qualification of the group as a whole for the organic certification.

A well-defined and implemented ICS is an essential condition for the group certification system. The group must demonstrate to the certification body that its ICS is solid and reliable.

The ICS personnel are responsible for performing the surveillance internal inspections in all farms, as well as keeping all necessary documents and records.

Administrative structure

The ICS must include at least internal inspectors and a peer-review and decision making committee.

It may include more complex structures such as director / president, responsible for trainings, technical manager, marketing manager, etc.

The group must have an ICS organization chart, or a clear description of its internal structure and definition of responsibilities among its members.

Admission of new members

The ICS must define procedures for admission of new members.

The certification of new members depends at least on performing a complete internal inspection and of the approval of the results by the certification body.

Knowledge of the standards

The group must make the applicable regulations available to the producers (or summaries adapted to their knowledge) and let them know about any updates.

The group must also ensure that all member producers are aware of their rights and duties, as well as of the consequences of non-compliances and sanctions.

Regular producers' trainings are the key so they fully understand and fulfill the organic production standards.

Personnel competence

The group must ensure that ICS personnel are competent.

ICS members must, at least:

- Be proficient in the producers' language or dialect;
- Be acquainted with the local production systems;
- Be acquainted with the organic agriculture principles and systems;
- Have knowledge of certification requirements and of the rules established in the group's own internal by-laws.

The ICS personnel must receive appropriate trainings (in content and frequency) to perform its duty appropriately.

The success of an ICS relies on consistent and continuous trainings for all members. Trainings may be offered by an accredited certification body or by other people with experience and knowledge of auditing techniques and organic production rules.

The majority of trainings are generally conducted by the internal personnel, but it is recommended that at least one annual training is done by an external expert.

Impartiality

Impartiality is a cornerstone of any certification system.

ICS members are regularly facing the temptation not to report some non-compliances, which may put the certification of the whole group at risk.

To control this risk, the group must implement a mechanism to eliminate or mitigate potential conflict of interest risks of its ICS members.

Among others, it is expected that:

- ICS members declare any kind of conflict of interest, be it personal, commercial or professional, and are not assigned to performing inspections or taking decision in case of conflict;
- There is a clear separation between internal inspectors and who offers technical advice to producers and who takes decision upon noncompliances, sanctions and corrective actions;
- Be given written guarantee that ICS members will not be punished in case they raise non-compliances or apply sanctions as a part of their duty.

Operation

The ICS regulation must be described and effectively implemented.

At least, it must ensure that:

- Internal inspectors are assigned by the group and perform a complete internal inspection in all farms and processing facilities, at least annually;
- The result of such inspections is documented;
- Be required corrective actions from members of the group in irregular situation, under penalty of applicable sanctions;
- Members with serious infringements are excluded and non-compliant products are withdrawn from the marketing chain;
- The certification body is informed of irregularities and applied sanctions.

Documentation

The ICS must have internal records corresponding to items determined by the certification body.

At least, it must keep a list and a map of members' farms and processing units, the production plans, individual harvest estimations and certification status, contracts with the producers, internal inspections reports and records of actions taken in case of non-compliance.

Assessment of the ICS by the certification body

The main objective of the external inspection by the certification body is to assess the efficiency of the ICS in order to corroborate or invalidate its results.

ICS failures – be it detected at any level – represent a risk for the group certification as a whole and must be treated very rigorously.

To undergo such assessment, the IBD inspector uses four means:

- The inspection of the ICS documents and records;
- The interviews with the ICS members (inspectors, reviewers and decision makers);
- The witness of an inspection performed by an internal inspector;
- The external inspection upon a representative sample of the group. This sample is equivalent to the square root of the total number of producers, multiplied by the risk factor. For example, out of a total of 100 producers, in a low risk situation, IBD will inspect 10 producers.

These methods aims at the same objective: verifying if the ICS is controlling efficiently the compliance of the group members with the certification requirements.

What happens in case of irregularity?

Disparities between the IBD inspector assessment and internal inspectors' assessments suggest a potential deficiency of the ICS and must be treated very carefully. In such case, the motive of the discrepancy is analyzed and the failure of the ICS is pointed out in the most specific manner (failure of internal inspectors training or qualification, wrong procedure, failure in applying the procedure, etc).

At the end of the evaluation the IBD inspector records both the non-compliances of the ICS failures and the eventual deviations found at the producers' level.

The ICS is responsible for producing and submitting, for each non-compliance:

- A root cause analysis;
- An extension analysis to demonstrate the extension of the deviation within the total member producers' universe (when considered necessary);
- A correction of encountered deviation(s);
- A corrective action aiming at preventing the non-compliance to reoccur in the future.

Generally, ICS actions must be systematic, in a way to reach the group as a whole (and not only specific to the sampled producers), as for example adjusting internal procedures or documents, training of internal inspectors, changing the frequency or period of internal inspections, etc.

Proposed actions must be sufficient in its extension and rigorousness to demonstrate full compliance of the group with the certification requirements.

Granting certification

When the evaluation results in a positive decision, or after correction of non-compliances, IBD issues or renews the group Certificate.

With this certificate the producers may sell their certified organic production, with the corresponding certification logo.

<u>Certification renewal / surveillance</u>

Annually the ICS is responsible for the surveillance of certified producers, by means of new internal inspections and adequate treatment of the results.

IBD also performs annually new inspections of the ICS and of a sample of producers, in order to assure the renewal of the Certificate.