



SMALLHOLDER GROUP CERTIFICATION

Training Curriculum on the Evaluation of Internal Control Systems A Training Course for Organic Inspectors and Certification Personnel

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The ICS inspection protocol was reviewed by a number of certification bodies, whose feedback was an important contribution to the protocol and this training manual. However, the document does not necessarily reflect the views of these partner certification bodies.

Many thanks go to Eva Mattsson (Grolink) and Ulla Johansson (free-lance agricultural teacher) for their comments to various issues.

The training curriculum was tested in pilot trainings in Tanzania and India.

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Principles of Organic Agriculture

Preamble

These Principles are the roots from which organic agriculture grows and develops. They express the contribution that organic agriculture can make to the world, and a vision to improve all agriculture in a global context.

Agriculture is one of humankind's most basic activities because all people need to nourish themselves daily. History, culture and community values are embedded in agriculture. The Principles apply to agriculture in the broadest sense, including the way people tend soils, water, plants and animals in order to produce, prepare and distribute food and other goods. They concern the way people interact with living landscapes, relate to one another and shape the legacy of future generations.

The Principles of Organic Agriculture serve to inspire the organic movement in its full diversity. They guide IFOAM's development of positions, programs and standards. Furthermore, they are presented with a vision of their world-wide adoption.

Organic agriculture is based on:

- The principle of health
- The principle of ecology
- The principle of fairness
- The principle of care

Each principle is articulated through a statement followed by an explanation. The principles are to be used as a whole. They are composed as ethical principles to inspire action.

Principle of health

Organic Agriculture should sustain and enhance the health of soil, plant, animal, human and planet as one and indivisible.

This principle points out that the health of individuals and communities cannot be separated from the health of ecosystems - healthy soils produce healthy crops that foster the health of animals and people.

Health is the wholeness and integrity of living systems. It is not simply the absence of illness, but the maintenance of physical, mental, social and ecological well-being. Immunity, resilience and regeneration are key characteristics of health.

The role of organic agriculture, whether in farming, processing, distribution, or consumption, is to sustain and enhance the health of ecosystems and organisms from the smallest in the soil to human beings. In particular, organic agriculture is intended to produce high quality, nutritious food that contributes to preventive health care and well-being. In view of this it should avoid the use of fertilizers, pesticides, animal drugs and food additives that may have adverse health effects.

Principle of ecology

Organic Agriculture should be based on living ecological systems and cycles, work with them, emulate them and help sustain them.

This principle roots organic agriculture within living ecological systems. It states that production is to be based on ecological processes, and recycling. Nourishment and well-being are achieved through the ecology of the specific production environment. For example, in the case of crops this is the living soil; for animals it is the farm ecosystem; for fish and marine organisms, the aquatic environment.

Organic farming, pastoral and wild harvest systems should fit the cycles and ecological balances in nature. These cycles are universal but their operation is site-specific. Organic management must be adapted to local conditions, ecology, culture and scale. Inputs should be reduced by reuse, recycling and efficient management of materials and energy in order to maintain and improve environmental quality and conserve resources.

Organic agriculture should attain ecological balance through the design of farming systems, establishment of habitats and maintenance of genetic and agricultural diversity. Those who produce, process, trade, or consume organic products should protect and benefit the common environment including landscapes, climate, habitats, biodiversity, air and water.

Principle of fairness

Organic Agriculture should build on relationships that ensure fairness with regard to the common environment and life opportunities

Fairness is characterized by equity, respect, justice and stewardship of the shared world, both among people and in their relations to other living beings.

This principle emphasizes that those involved in organic agriculture should conduct human relationships in a manner that ensures fairness at all levels and to all parties – farmers, workers, processors, distributors, traders and consumers. Organic agriculture should provide everyone involved with a good quality of life, and contribute to food sovereignty and reduction of poverty. It aims to produce a sufficient supply of good quality food and other products.

This principle insists that animals should be provided with the conditions and opportunities of life that accord with their physiology, natural behavior and well-being.

Natural and environmental resources that are used for production and consumption should be managed in a way that is socially and ecologically just and should be held in trust for future generations. Fairness requires systems of production, distribution and trade that are open and equitable and account for real environmental and social costs.

Principle of care

Organic Agriculture should be managed in a precautionary and responsible manner to protect the health and well-being of current and future generations and the environment.

Organic agriculture is a living and dynamic system that responds to internal and external demands and conditions. Practitioners of organic agriculture can enhance efficiency and increase productivity, but this should not be at the risk of jeopardizing health and well-being. Consequently, new technologies need to be assessed and existing methods reviewed. Given the incomplete understanding of ecosystems and agriculture, care must be taken.

This principle states that precaution and responsibility are the key concerns in management, development and technology choices in organic agriculture. Science is necessary to ensure that organic agriculture is healthy, safe and ecologically sound. However, scientific knowledge alone is not sufficient. Practical experience, accumulated wisdom and traditional and indigenous knowledge offer valid solutions, tested by time. Organic agriculture should prevent significant risks by adopting appropriate technologies and rejecting unpredictable ones, such as genetic engineering. Decisions should reflect the values and needs of all who might be affected, through transparent and participatory processes.

How to use this training manual

This training curriculum is a structured analogue to the [IFOAM Training Manual for Organic Agriculture in the Tropics](#). Trainers are referred to this manual for further information how to organize effective trainings.

The ICS training curriculum consists of two parts:

- 1) [Slides](#) for each chapter of the IFOAM ICS Training Manual.
- 2) [Training Manual](#):
 - The left side contains information that the trainer could present with the slides.
 - The right side of each page shows the corresponding slides plus discussions/working group exercises for illustration and better understanding of the content.

The complete manual and slides (on the CD) are divided into 8 separate Microsoft Word/PowerPoint files (teaching units). In each Word file, you can open the corresponding and complete PowerPoint file by double-clicking the first slide on the right side.

In addition to this training manual the following documents are an important component of this training course and should be distributed to the participants:

- [ICS inspection protocol](#), consisting of
 - 'ICS Inspection Procedures'
 - 'ICS Inspection Report with Farm Re-Inspection Report'
 - 'ICS Certification Requirements and Compliance Criteria'
- [IFOAM ICS Guidance Manual for Producer Organizations](#) (with appendix).

Although the training manual is specifically geared towards smallholder situations, the content is also relevant to a wider audience. The information is useful to any individual or organization interested in developing and maintaining an Internal Control System.

The complete training curriculum can be done in approximately 3 days, depending on how many exercises and discussions are included and the level of experience of the participants. Additionally, a 1-day sample inspection of an ICS operator should be scheduled. Approximate times needed for presentation and the exercises are indicated in the table of contents.

The training course was designed for experienced organic inspectors who need to be trained in the specific tasks of smallholder group certification. It is NOT a training course for completely new organic inspectors.

The inspection protocol and hence also this training course will need to be adapted by different certification bodies according to their own inspection & certification procedures and policies.

Wherever possible, trainers are advised to collect local examples of ICS documents for illustration and a basis for discussion.

However, a couple of case studies and sample are included as appendices to this training manual. Some of them are only available on paper; the full course document can be ordered from IFOAM.

Chapter	Page	No. slides approx. time
How to use the training manual		
1. INTRODUCTION The IFOAM ICS projects Smallholder group certification Overview of ICS certification requirements New ICS inspection protocol Training course: Structure & terms	1	16 slides approx. 0.75 h
2. OVERVIEW OF INSPECTION PROCEDURES The ICS inspection (ICS office & farm re-inspections) Inspection of buying and handling Reporting, evaluation of nonconformities & certification	12	10 slides approx. 1 h
3. INSPECTION SCHEDULE & RISK ASSESSMENT Who is eligible for smallholder group certification Risk assessment Risk categorization and external re-inspection rates	19	10 slides approx. 2.5 h
4.1 INSPECTION OF ICS OFFICE (PART 1) Basic description of activities ICS organization The 'ICS manual' The Internal Organic Standard ICS documentation	25	32 slides approx. 4-5 h
4.2 INSPECTION OF ICS OFFICE (PART 2) Internal inspection Yield estimates Approval & sanctions ICS staff qualification and conflicts of interest	43	18 slides approx. 3.5 h
5. EXTERNAL FARM RE-INSPECTIONS Selection of farmers for re-inspection Re-inspection procedures Witness audits	55	13 slides approx. 1 h 1 day sample inspection
6. INSPECTION OF PRODUCT FLOW Buying procedures Handling requirements for organic produce Organic processing	63	10 slides approx. 3-4 h

Chapter	Page	No. slides approx. time
7. REPORTING, EVALUATION, AND CERTIFICATION Reporting Relative importance of different compliance criteria Evaluation for certification	70	16 slides approx. 1-1.5 h
TOTAL		Approx. 18 h = 3 days plus 1 day field visit

1. Introduction

The IFOAM ICS Projects

Smallholder groups have been certified on the basis of internal control systems for many years. However, the requirements regarding smallholder group certification and internal control systems have differed considerably over the last years between different certifiers and between different import authorities. Therefore IFOAM started a harmonization process in 2001 with several harmonization workshops.

As an important result of the increasing consensus on smallholder group certification, the formal acceptance of smallholder group certification by European authorities could finally be achieved. In November 2003 the EU Commission published the 'Guidance document for the evaluation of the equivalence of organic producer group certification schemes applied in developing countries,' which formally outlines some principles of an internal control system (ICS) and also defines the necessary minimum external control rates.

IFOAM also developed requirements, which are to be followed by certification bodies when carrying out group certification (Chapter 8.3 of the IFOAM Accreditation Criteria for Bodies Certifying Organic Production and Processing [IAC]). Chapter 8.3 of the IAC also defines minimum requirements to be fulfilled by the group seeking certification. It is provided in the background material section of this training manual. Moreover, IFOAM initiated the development of the document 'IFOAM ICS Guidance Manual for Smallholder Groups'.

The slides give an overview on IFOAM's activities with regard to harmonization in ICS certification. In addition to organizing the harmonization workshops and lobbying for the EU guidance document to define accepted minimum requirements in the EU, IFOAM initiated also two major ICS projects:

- Project 1: IFOAM developed an 'IFOAM ICS Guidance Manual for Smallholder Groups' and elaborated an 'ICS training manual (complete training course) for producer groups'.
- Project 2: IFOAM initiated the development of harmonized inspection procedures for the ICS evaluation and a common training tool for training inspectors and certification personnel in ICS evaluation. This is the training manual as presented in this document.

All ICS requirements in the IFOAM inspection procedures as presented in this course are based on the IFOAM ICS Guidance Manual, which reflects a wide consensus on smallholder group certification including all relevant aspects of the EU guidance documents.

Harmonization in Smallholder Group Certification

For many years smallholder groups have been certified organic on basis of an ICS, but according to different requirements.



A new harmonized IFOAM ICS Guidance Manual has therefore been developed to harmonize ICS requirements.

Also, the EU has published a guidance document for all EU import authorities in which the certification of smallholder grower groups in developing countries is regulated and minimum external re-inspection rates be defined.

IFOAM ICS Projects

Harmonization: - three smallholder harmonization workshops since 2000
- lobbying for an EU guidance document on smallholder group certification

Project 1: a) revised ICS Guidance Manual for producer groups
b) Training manual for setting up and harmonizing ICS (with 3 pilot trainings)

Project 2: a) Protocol for ICS inspection & evaluation
b) Training manual for ICS inspection and evaluation (for inspectors and certification staff)

Project coordination (both projects): IMO Switzerland



The inspection procedures have been reviewed by different selected certification bodies, both international certifiers and national certifiers in developing countries. Some of these certifiers were IFOAM accredited, others not.

In spite of all harmonization efforts, certain details are still being handled differently by different certifiers or authorities. Therefore this training manual can only serve as a first guideline; any unclear or critical issues will still have to be decided by each organic certification body.

Smallholder Group Certification

Principles of Smallholder Group Certification

A majority of agriculture practitioners worldwide are smallholders and often are located in remote areas with long travel times from one place to another. Also, the overall revenue from their agricultural production is usually far too small to allow a viable farm inspection by an external inspection body for each farmer.

For these reasons, long before government regulations, about 15 years ago, smallholders in developing countries in cooperation with certification bodies have been developing systems to assure compliance with organic standards for producers as a group. Different forms of quality assurance systems for smallholder groups have developed over time with respect to the nature and size of the operation, ranging from tens to thousands of individual producers.

Smallholder group certification implies that there is:

- A central body being responsible for ensuring the group's compliance to applicable standards. The group can be a self-organized cooperative or a farmers association or simply a buyer or processor who contracts farmers ('contract production').
- A formal internal control system (ICS) in place.
- One single certification for all individual production as well as processing and handling activities registered within the group. Individual operators within the group may not use the certification independently.

What is an ICS?

IFOAM Definition of an ICS: see transparency.

This formal role of the ICS as an official 'control body' implies that certain basic formalities for organic inspection need to be fulfilled, as organic standards describe not only how organic production needs to be practiced, but also how this can be controlled. These 'inspection requirements' include a lot of issues like documentation, inspection procedures, etc., that often ICS operators do not primarily think of when they wish to set up an organic certification project.

Motivation Exercise: Experiences in ICS inspections

1. Introduction

4

Principles of Smallholder Group Certification

- A central body within the farmers group ensures the compliance of all smallholder farmers with an organic standard.
- The Group has a formal internal control system (ICS).
- One certification for the group (not for individual farmers).



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Training Manual on the Evaluation of Internal Control Systems

Ask participants to present their present experience in smallholder group certification and the guidelines on which their certification body has based their assessment. Were inspections based on an ICS with rather low external control rates? Or has the certifier worked with a rather low-key ICS and rather high external control rates (how high)?

1. Introduction

5

Definition of an ICS

IFOAM Definition:

An internal control system (ICS) is a documented quality assurance system that allows the external certification body to delegate the annual inspection of individual group members to an identified body/unit within the certified operator.

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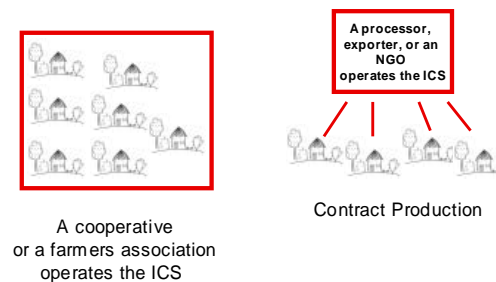
Training Manual on the Evaluation of Internal Control Systems

Types of Smallholder Groups

There are two typical types of smallholder groups that are eligible for smallholder group certification:

- a. A Group of farmers (e.g. a cooperative) sets up an internal control system and also organizes joint buying and marketing for their organic produce from farmers in the organic program. The group owns the organic certificate.
- b. A processor and/or exporter (sometimes this can be an NGO) contracts small farmers to produce certain organic crops for the company. The processor or exporter is the ICS operator and organizes all internal control procedures. The company owns the organic certificate.

Basic Types of Smallholder Projects



Discussion: Typical Smallholder Group Structures

Discuss with participants what project type is most common in their specific area of inspection and certification. Are there a lot of self-organized farmers groups? Or have organic projects been initiated by an "outside" group, and, if so, by NGOs or by commercial traders? How sustainable do you estimate the different project types to be?

Overview of ICS Certification Requirements

In this introduction, a brief overview on the ICS certification requirements is presented. All issues will be dealt with in detail in this inspector's course; these slides give an overview before details are presented.

For better linkage to the IFOAM ICS Guidance Manual, all requirements are listed here as the chapters of that new manual.

Minimum certification requirements are that the ICS:

- (1&2) Has written procedures and forms (ICS Manual).
- (3) Is aware of risks and critical control points.
- (4) Has an internal organic standard.
- (5) Has documented effective procedures for internal farm inspection and internal approval and is dealing with non-compliances.
- (6) Has qualified personnel and a clear structure.
- (7) Ensures training of farmers as well as ICS staff.
- (8) Handles/supervises organic Product Flow Control.

Each of these points will be briefly presented now, with more details and discussions about all requirements following later in this course.

ICS Manual

The ICS operator has to have policies, written procedures, and standardized forms to ensure an objective and reliable control system. This is similar to a certification body that also has to have some internal quality manual to standardize its activities.

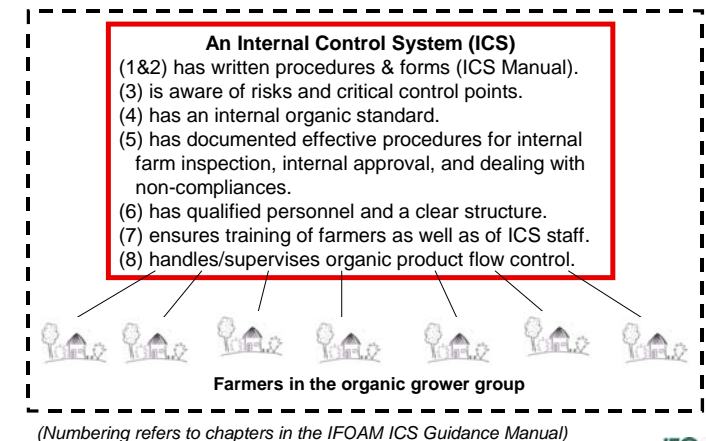
The term 'ICS Manual' is new. So far operators were only required to have certain forms (e.g., inspection report form) and to regulate a few procedures in writing (e.g., in the internal regulation, as the core ICS document was called in the IMO/Naturland Manual for Quality Assurance in Smallholder Organizations).

What is meant with ICS Manual is in principle the sum of all forms and written procedures on its ICS. The term 'manual' implies that all this could be organized in one overall document that contains procedures, policies, and forms and gives ICS personnel as well as certifiers the easiest access to information on how the system is supposed to work.

The IFOAM ICS Guidance Manual is an example of how an ICS Manual could look.

Another change is that the ICS operator now has to present an overview of his activities.

Overview of Certification Requirements



Training Manual on the Evaluation of Internal Control Systems

(1&2) ICS Manual and Description of Activities

The ICS must have documented and standardized policies, procedures, and forms, i.e., an ICS manual.



- See the IFOAM ICS Guidance Manual for an example.
- Can also be organized as separate documents.
- Many organizations already have an 'internal regulation' that could be considered a basic 'ICS Manual' in the sense of the new IFOAM ICS approach as presented in this course.

The ICS operator has to present (e.g., in the ICS Manual) a brief overview of its organization and registered farms, as well as on buying and handling procedures.



Training Manual on the Evaluation of Internal Control Systems

Risk Management and Risk Assessment

It is extremely important that risks that may jeopardize the organic quality (or even simply threaten the organic certification for formal reasons) are taken into account not only by all involved in the ICS but also by the external inspector.

Hence, the ICS operator is required to prepare a detailed risk assessment at the beginning of certification (or with introduction of this new system). Obviously the aim is to take all appropriate countermeasures so that a potential risk will never actually become a problem. It is very helpful and useful for ICS operators to be aware of relevant risks and design their procedures and requirements accordingly.

In addition the external inspector has to do an overall risk assessment. The main aim of this formalized risk assessment is to determine the minimum external control rate, but it is just as important that the inspector follow a risk-based inspection approach and that he/she is always aware of critical control points.

The Internal Organic Standard

This is a newly created term. The 'internal organic standard' is the internal production guideline, which outlines all farm production requirements, i.e., everything that an organic farmer will be expected to comply with.

The internal organic standard always has to take into account all applicable organic standard requirements and must therefore cover all important aspects (as far as relevant).

It should be written in clear and simple language.

*Example for one chapter in an 'Internal Organic Standard': Seedlings in an organic coffee project—
"Coffee seedlings have to be obtained from the organization's own organic nursery in XXX or from own propagation or from fellow organic farmers. Other coffee seedlings may not be used."*

(3) Risk Assessment and Risk Management

- Risks that may jeopardize organic quality must be known and taken into account in all internal procedures.
- Therefore, the ICS must do an initial risk assessment. All necessary measures must be taken by the ICS to minimize risks.
- The external inspector has to do an overall risk assessment to determine the minimum re-inspection rate and to be aware of critical control points.



(4) Internal Organic Standard

The internal organic standard

- outlines the farm production requirements in a way that can be understood by farmers and ICS staff.
- takes account of all applicable standards as far as these requirements are important and relevant for the operation.



Internal Control and Approval Procedures

The actual internal farm control procedures are certainly the core part of an ICS, and internal inspection is often also the only issue that people associate with an internal control system.

In the guidance manual the overall procedure of internal control is split into the following sub-processes:

- Registration of farmers: explanation of requirements, collection of basic data, contracting, mapping
- Internal inspection
- Yield estimates: the ICS must produce yield estimates. Since organizations organize the collection of yield estimates in different ways (and not always during internal inspection) this has been kept as a separate chapter.
- Internal approval and sanctions: after inspection an internal decision on compliance or non-compliance has to be made. Measures to correct non-conformities as well as internal sanctions need to be effectively implemented.
- ICS documentation: a summary of the documents that need to be available for each farmer and what summary documentation (farmers lists) need to be prepared.

Organization and ICS Personnel

The ICS staff is of utter importance for the success and efficiency of the system. It is important that one person has overall responsibility for the ICS. This person is usually called 'ICS Manager', 'ICS Coordinator' or something similar. The different tasks of the ICS need to be delegated to different people like extensionist/internal inspectors, purchasing officers, etc. In the end it is important that somebody is in charge and is qualified to do the work for each procedure of the control system.

For the integrity of an ICS it is also crucial that conflicts of interests are avoided; e.g., an inspector may not inspect his friends or family. The separation between extension and internal inspection, which has so far been considered a conflict of interest, is discussed in detail in a later chapter.

(In the sample organizational chart the green boxes at bottom represent contracted farmers at different project sites.)

(5) Internal Control and Approval Procedures

5.1 Registration of new farmers:
basic fam data, contract, map

5.2 Internal inspection
effective inspections, detailed internal inspection checklist

5.3 Yield estimates

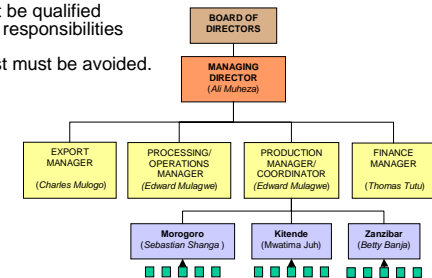
5.4 & 5.5 Internal approval & sanction procedures
approval procedures; sanctions must be appropriate & effective

5.6 ICS documentation
for each farmer and summarizing farmers lists



(6) Organization and ICS Personnel

- One person is responsible for the overall ICS implementation but may delegate responsibilities so that, for each ICS procedure or task, one person is in charge.
- All personnel must be qualified and aware of their responsibilities
- Conflicts of interest must be avoided.



Training

Training of both farmers and ICS staff is very important.

Farmers need to receive practical training in organic production as well as clear instructions on certification requirements they have to meet. Some smallholder groups decide to provide training and advice in field visits, some chose training seminars.

ICS personnel also need training to remain up to date with requirements and to optimize and harmonize their inspection and evaluation skills. Depending on the position, regular training in organic production, certification requirements, internal procedures, or inspection skills may be necessary. Training can be done in training workshops or by accompanying experienced colleagues on inspections.

(7) Training



Farmers have to be trained in organic farming methods and the rules for organic farming :

- field advice
- and/or farmers trainings



ICS personnel must be continuously trained in order to be aware of organic farming practices, certification requirements and important internal procedures.

New ICS Inspection Protocol

Based on the IFOAM Guidance Manual for producer organizations, a harmonized inspection protocol has been developed for individual adaptation and use by different certification bodies.

The inspection protocol has been reviewed by a couple of organic certification bodies (IFOAM accredited or not), but still certain aspects will need to be customized for each certifier's specific procedures & requirements. This course presents the generic IFOAM inspection protocol.

The following documents are available for certification bodies and inspectors. These are the documents that you have received as handouts for this training course.

Inspection procedures

- All steps from application for certification to certification: i.e., application, inspection planning (including how to calculate the minimum external control rate), ICS office inspection, farm re-inspections, risk assessment, reporting, evaluation of non-conformities, and certification.

ICS Inspection report form

- Contains some description of activities of the group.
- In the report all ICS compliance criteria with regard to smallholder group certification are checked in detail. Compliance criteria are numbered according to the chapters of the report.

ICS Compliance Criteria

- All ICS compliance criteria are presented again (with their numbers as in the report). The order follows the actual workflow of inspection (application, preparation, ICS office visit, etc.).
- The compliance criteria are fully described (in the report sometimes shortened).
- For each criterion it is indicated how it will be checked during inspection.
- For many criteria interpretation guidance and additional comments are given to the inspector.

ICS Inspection Protocol

The following documents are available as a basis for ICS inspection & certification. This course is based on the requirements and procedures as outlined in these documents.

ICS Inspection Procedures

- Procedures covering application for certification, inspection planning, inspection and certification.
- New rules for determining the minimum re-inspection rate

ICS Inspection Report

- Description of the activities of the group
- Evaluation by verification of compliance criteria.
Compliance criteria are numbered according to their order in the report

ICS Compliance Criteria with Comments for Inspector

- Lists again all compliance criteria (as in report), but with more details
- The order of presentation follows the actual workflow during inspection: preparation, ICS-office, farm re-inspection
- Offers comments/interpretation guidance for the inspector regarding certain criteria

Training Course

Introduction to training course

All numbering of chapters in this introduction has been done with reference to the IFOAM Guidance Manual in order to provide an overview of this manual. The training course from here onwards is based on the mentioned 'new' ICS inspection protocol. Thus, all numbers refer to the numbers of the compliance criteria in the ICS inspection report or the ICS compliance criteria document.

The training course contains details that might not be given in the inspection protocol documents. Thus, this training manual might be useful both for holding trainings in ICS inspection & evaluation, but also for inspectors to brush up their understanding of ICS evaluation by reading the training manual as an additional guidance document.

On the slides, symbols are usually added to the criteria to indicate how the respective criteria can be checked:



Check in ICS documentation (mainly in ICS office)



Check in interviews with ICS staff (ICS office and during re-inspection tours)



Check during sample farm inspections with farmers and field officers and/or neighbors




Structure of the Course

The course is presented in 7 chapters (see slide):

1. Introduction
2. Overview of inspection procedures
3. Inspection schedule & risk assessment
4. Inspection of the ICS (office)
5. External re-inspections
6. Inspection of product flow
7. Reporting, evaluation, & certification

Structure of this Training Course

• All numbers of the compliance criteria in this course refer to the numbers of the criteria in the new IFOAM ICS inspection report / ICS compliance criteria document and *no longer to a chapter of the ICS Guidance Manual!*

• How to verify?  ICS documents  Interviews  Field visits

Structure:

1. Introduction
2. Overview of inspection procedures
3. Inspection schedule & risk assessment
4. Inspection of the ICS (office)
5. External re-inspections
6. Inspection of product flow
7. Reporting, evaluation, & certification



Definitions

On this slide a few important terms are defined to ensure that everybody associates the same understanding with the given terms.

Please note also the clear distinction between “APPROVAL” for all internal ‘certification’ processes and “CERTIFICATION” for the decisions made by the external certification body.

Remark: depending on the country, more definitions may be needed for terms like ‘sanction’, etc.

Important Terms

Organic: CERTIFIED according to a certain organic standard
Conventional = not organic = not certified
ICS Operator: Body that organizes the ICS; this is usually the farmers cooperative or the contracting processor
ICS Manual: compilation of all documents regulating the ICS: policies, procedures, forms, etc.
Non-compliance: a standard requirement is not met. A non-compliance always refers to a certain organic standard, e.g. spraying Ambush is a non-compliance because not in standard, but spraying copper is allowed because it is allowed in standard.
Prohibited: not permitted according to certain standard
Approval : internal ‘certification’ by ICS according to the internal organic standard and procedures
Certification : certification by the (external) organic certifier according to regulations, public or private organic standards



2. Overview ICS Evaluation Procedures

In principle the procedures for ICS evaluation are very similar to any other type of organic inspection. In the slide all tasks that are typically implemented by the certification office are written in blue, while the tasks of the inspector are written in red.

There is first the application process with collection of data about the activities of the operator. Then, the inspection is planned with some first rough preliminary risk assessment to determine the minimum external re-inspection rate followed by setting the draft inspection schedule.

Preparation: The inspection is prepared and assignment and preparatory documents sent to the inspector. The inspector him/herself has to prepare the inspection, arrange final inspection schedule details, etc. If possible the inspector should read the ICS Manual BEFORE the inspection!

Then, the actual ICS inspection can start. For easier presentation it has been split in 3 sections, but all are integral parts of the actual on-site ICS inspection:

- Inspection Schedule & Risk Assessment: During the inspection, the inspector works out the details of the inspection schedule (which sites to inspect when, etc.) and a complete risk assessment. Usually it is begun at the start of each inspection but since it is an overall evaluation of the operation, normally it can only be finalized mid-inspection (after the first few days). The risk category is determined and the minimum external re-inspection rate is set.
- ICS Inspection: The inspection of the ICS office and the documents is a very important part of the overall ICS evaluation.
- Sample inspections: Sample farm inspections (external farm re-inspections) are an important tool for assessing an ICS.
- In addition to the actual ICS inspection, the product flow is checked: buying, handling (warehouses etc.), and all central processing units, as well as export activities.

At the end of the inspection, the report is completed and the findings discussed with the ICS Coordinator. Non-conformities are listed and appropriate corrective measures agreed upon.

Overview: ICS Evaluation Procedures

- Application for certification
- Inspection planning with preliminary risk assessment, determination of re-inspection rate, & inspection schedule
- Preparation of inspection



- Preparation of inspection
- Inspection schedule: selection of farmers, details of inspection schedule
- Risk assessment
- Inspection of ICS office
- Sample farm inspections
- Product flow inspections: buying, processing, export
- Reporting & evaluation of non-compliances (during inspection and afterwards)

- Receiving the report back
- Evaluation & certification
- Follow up on non-compliances



Discussion: Can inspection planning be done by the certifier?

Discuss with participants whether at present the inspection schedule is defined in detail by the certifier or whether a lot of decisions on the external re-inspection rate and the actual inspection schedule need to be made by the inspector DURING the inspection.

Can the risk categorization really be done in the certification office? Is it possible for new projects? What information would you require in order to make a good inspection plan? How can the certification office ensure that enough time is always planned for the inspection without planning for too many buffer days? (→ For new inspections a couple of days for 'risk assessment' could be included so that sufficient time is available even in case the project is found to be "high risk category".

How problematic is it to finalize the inspection schedule DURING the inspection?

The ICS Inspection

This slide illustrates the three main parts of the on-site ICS inspection:

- Risk assessment and inspection scheduling is started before the inspection, but finalized during the inspection, usually including insights from both office and field visits.
- Inspection of the ICS office (ICS procedures & documentation).
- External farm re-inspections & farm witness audits.

In addition to the actual inspection of the ICS, the product flow of organic produce has to be inspected.

In practice the aforementioned parts of an inspection will not be done in a uniform order. Risk assessment is done during the inspection, and not necessarily first. Farm-re-inspections may be done between office inspection days, some aspects of which can be checked in the ICS office could also be checked during field inspections (e.g., checking farm documentation), etc. Additionally there are sections on reporting & evaluation of non-conformities.

In this part of the course, we will initially discuss each part of the inspection only briefly as an overview. Each part is then dealt with in a separate chapter with work group exercises and details on requirements and how to check them.

Inspection Schedule & Risk Assessment

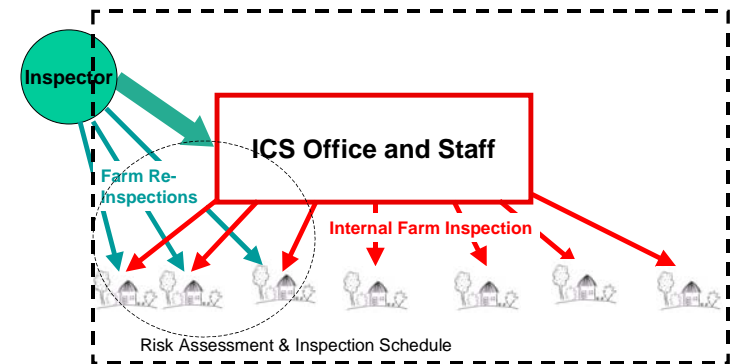
As mentioned, inspection schedule and risk assessment are closely linked. Also the verification of whether the requirements for smallholder group certification are met is important for the final inspection schedule since big farms (not 'smallholders') will always need to be externally inspected.

Both checking the requirements for group certification and doing a risk assessment with preliminary determination of the external re-inspection rate are started in the certification office in order to draft the inspection plan. However the risk assessment and detailed inspection schedule usually needs to be finalized by the inspector during the inspection.

The inspector should read the operator's ICS Manual before the inspection and also do some preliminary risk analysis and collection of critical control points.

The risk assessment is finalized during the inspection, and the inspection schedule might need to be adapted during the inspection.

On-site ICS Inspection



Inspection Schedule & Risk Assessment

- Requirements for group certification are fulfilled and basic ICS in place.
- Preliminary risk assessment
- Preliminary decision on external control rate and scope/focus of inspection.



- Screening of project description, ICS Manual and all ICS forms ⇒ preliminary analysis of potential weak points and critical control points

Usually during inspection

- Risk Assessment to confirm re-inspection rate and to finalize list of critical control points
- Definition of detailed inspection schedule with selection of farmers for re-inspection

Inspection of the ICS Office

In this part of the ICS inspection, the documentation and procedures of the Internal Control System are checked:

Usually the inspection includes a visit to the ICS office, interviews with ICS Staff (in particular the ICS coordinator), and an evaluation of the ICS Manual and ICS farm-files.

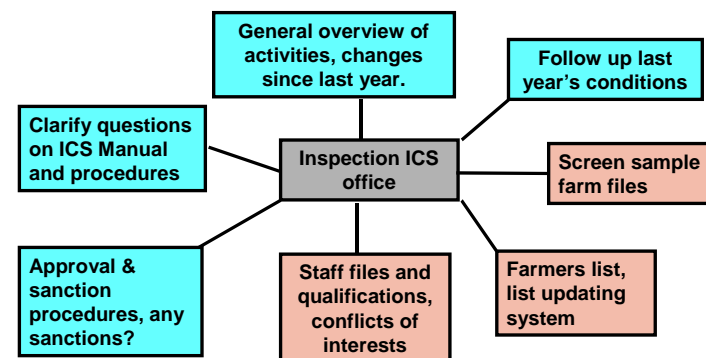
- General overview of activities: understand present situation, changes since last year.
- Follow up last year's conditions: have the agreed improvement measures been implemented?
- Check ICS Manual and clarify open questions with ICS Coordinator: understand how well the ICS Manual is used, how often it is updated, who prepares the documents, how they are distributed. Are all procedures in the manual described in a clear way? If some procedures or parts are missing, ask whether they are available elsewhere.
- Understand approval and sanction procedures (particularly if not described in the manual). What happens AFTER the internal inspection? What happens in case of deviations? Check all sanctions since last inspection. What were the main problems, how did the ICS react?
- Screen farm files: random files and some "problematic cases".
- Check farmers list – cross-checking with farm files; is the list complete and up to date? Does the list contain all necessary details?
- Check staff files: trainings, contract, job descriptions, etc.

Motivation Exercise: What to check in the ICS office

Ask participants what requirements could be checked in the ICS office. Did they spend a lot of time (in past ICS inspections) in the office or only concentrate on farm visits?

Let them come up with control points first and then present the following summary.

Inspection of ICS Office



Re-Inspections (External Farm Inspections)

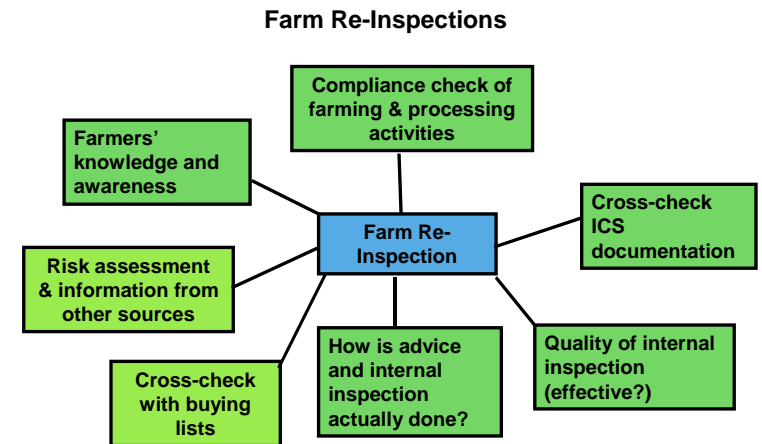
Re-inspecting a certain number of farmers is an important and integral part of the ICS inspection. Information about production and the ICS can be obtained in the course of days out in the fields.

The most important and obvious aspect is that while re-inspecting the farmer, the inspector gives the confirmation that the farmer actually complies with the organic standards. Apart from this a lot of other very important information about the functioning of the ICS can be obtained during field visits:

- Cross-check with ICS documentation: Were the findings of the internal inspection the same as of the external inspection? Are forms filled in correctly and clearly with regard to the actual situation found in the field? Are there inconsistencies among various ICS documents for the same farmer?
- How qualified was/is the internal inspector? This can be checked both by accompanying internal inspectors (witness audits) and by taking them along for the field inspections and interviewing them about their work and understanding of organic farming.
- How is advice given and inspection done? Procedures on paper are one thing, reality in sometimes remote and inaccessible areas is another thing.
- Cross-checking with buying: Farm inspection can provide a good occasion to cross-check on a spot check basis buying figures as presented by the ICS Operator with the information given by farmers.
- Information from the fields inspection visits is very important for the overall risk assessment. Usually some neighbors and comparable farmers in the area should also be interviewed to find out about general farming practices in the region.
- Inspection is a good occasion to check the farmers' understanding and knowledge of organic farming. Have they received training? Was the training practical and 'good' enough?

Motivation Exercise: Information from sample farm inspections
Ask participants what they can find out in farm re-inspections. What is the main purpose of farm re-inspections and what other information needs to be checked during the field visits? How important are field visits, compared to the time spent in an ICS office?

Let them come up with some control points first and then present the following summary.



Farm re-inspection report forms are used for these external farm inspections

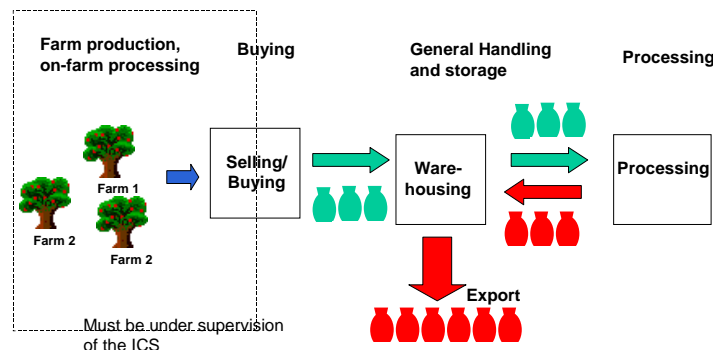
Inspection of Buying and Handling

An ICS inspection also covers the process of buying the produce from the registered organic farmers.

In addition to this, usually some subsequent handling and processing is also subject to inspection: warehousing, processing, packaging, export, etc.

All these steps must be inspected and certified like any other processing or exporting operation. Many certifiers will handle this as a group certification, i.e. consider the different operators involved (e.g., coffee cooperative with 2 contracted processors) all together as a 'project'.

Inspection of Buying/Selling and Handling



Reporting

The harmonized IFOAM ICS evaluation protocol also includes a detailed ICS inspection report. During and/or after the inspection, the ICS report is filled in as a checklist.

The findings and necessary corrective measures are then summarized at the end of the report and the results communicated to the ICS coordinator who countersigns the inspection report.

If required by the certification body the same report format can be used during or after the inspection to prepare a more detailed electronic report on the computer (with more comments and descriptions).

The inspector submits the inspection report together with the farmers list and some illustrative documents (appendix) to the certification body.

Reporting

INSPECTION REPORT
SMALLHOLDER GROWERS GROUP WITH ICS
Report N°: _____

1	Project	2
2	Inspection Details	2
2.1	Details on Inspection	2
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3	Project Description	3
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5	The Internal Control System	5
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1 Project	
Inspector/Coordinator Group Name	Inspector/Coordinator
Producer Group Address	Operator (Physical Address, Village, Town, Country)
Inspector	ICS Project Manager
Date	
Sign	

- ICS inspection report is completed.
- Report serves as checklist during inspection (usually completed by hand).
- Findings of the inspection discussed with ICS Manager. ICS Manager has to countersign the report.
- If needed, the same format is used after the inspection to prepare the complete report electronically with more details/descriptions.



Evaluation of non-conformities

During the inspection, it will most probably be found that a couple of compliance criteria have not been met by the operator. But how should these non-conformities be dealt with?

How critical is it if, e.g., the internal inspection has not been finalized for all farmers? Or if the farmers list does not contain anything but the farmer's name and organic status?

Each certification body will still have its own sanction system. However, for harmonization purposes, each compliance criterion in the report is given a certain relative weighing of importance for certification.

A-Criteria are "MAJOR MUSTS", i.e. they must be fulfilled for certification.

B-Criteria are "MINOR MUSTS", which must be implemented short term. They are very important, but the operator is given a certain transition time to implement the requirements. A certain % of B-criteria should also be fulfilled before certification can be granted.

C-Criteria are "MINOR MUSTS" which may be implemented medium term. The ICS concept also contains some requirements that are clearly development targets. The organization should work towards compliance with these criteria but is given substantial time for implementation. C-criteria are typically criteria about capacity building, long-term sustainable practices, and well-organized documentation systems (more than absolute minimum).

Also, in this part of the course we will discuss a couple of critical non-compliances and how they could be dealt with. E.g., what if 10% of the farmers were not inspected internally?

Of what if we find during the inspection that the cardamom in the organic pepper field on three farms has been treated with chemicals and the ICS has failed to detect this?

Certification

After due evaluation and subject to the fulfillment of the minimum requirements, certification is granted. ONE certification is granted for the whole group.

Usually for groups there are 3 certification documents:

- The operator certificate for the group
- The 'Certified Farmers List' (as an appendix to the certificate)
- The certification decision, which also lists necessary corrective measures and/or sanctions (if any)

Evaluation of Non-conformities

Compliance criteria have different levels of importance:

- A: Major MUST
- B: Minor MUST to be implemented short term
- C: Minor MUST to be implemented medium term
- D: Recommendation



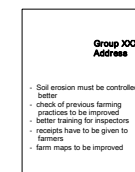
What should be done if ...
... ICS has not completed 100% internal inspection?
... ICS has failed to detect minor or major non-compliances?
... ICS is formally incomplete/not well documented?

Certification



Certificate for the group

Certified farmers list



Certification decision with necessary corrective measures

Introduction of the 'new inspection protocol'

So far, there are many different ICS inspection protocols. Also import authorities have not yet been able to agree on uniform requirements for smallholder groups certification and request different re-inspection rates, different information on the functioning of the ICS, etc.

The IFOAM harmonization workshops and the new IFOAM ICS Guidance Manual for Producer Groups have already resulted in some more consensuses of the most important aspects of an internal control system. Also the new EU guidance document on smallholder group certification defines for the first time a uniform approach for all European import authorities.

The 'new' IFOAM ICS inspection protocol as presented in this training hopes to further support IFOAM's and certifiers' efforts towards harmonization. However, all certifiers wishing to use the harmonized inspection protocol will certainly need to adapt certain parts to their specific procedures and policies. Perhaps some criteria will be considered more or less important than proposed in this inspection protocol, or perhaps some aspects are found missing. This also refers in particular to all aspects of the farm level, where different certifiers tend to have quite different standards and interpretation of standards.

Since all involved (ICS operators, certifiers, and import authorities) will need some time to understand the 'new' requirements (depending on the certifiers previous ICS policy, there may be minor or major changes in requirements for the operator), it is suggested that all ICS operators be treated as "new operators" in the first year of introduction of the IFOAM ICS inspection protocol.

Being considered as 'new operators' would imply:

- slightly higher external re-inspection rates (more than compulsory minimum numbers for respective risk category).
- lower 5 of B criteria must be fulfilled, time span for implementation of C criteria is longer.

To re-inspect slightly more than the actual minimum number of farmers also ensures secure market access for producer groups, since also the different European (and other) authorities might need time to 'digest' the new system (even the EU's own new ICS approach is not yet fully known to all authorities).

In principle all major European import countries have confirmed that they accept the EU guidance documents (with the minimum requirements as included in the IFOAM inspection protocol); however, the practice of desk officers might still be a bit different in the beginning.

Introduction of the new harmonized evaluation system

- Each certifier will probably adapt this standard system to its particular inspection & certification system and may add additional requirements or chose lower standards for some aspects. This applies in particular to all aspects checked on farm level for which each certifier will have its own interpretation of the requirements.
- It is suggested that, in the first year of the introduction of this new inspection system and the harmonized certification requirements, all ICS operators should be handled as "new operators" or "first inspections". This implies that they are expected to fulfill fewer requirements and that slightly higher re-inspection rates are recommended.
- European import authorities may need time to internally familiarize themselves with the new ICS system and the new minimum control rates. Certifiers need to feel on the safe side that lower control rates will still ensure easy market access for their clients.

3. Inspection Schedule & Risk Assessment

In this section the following aspects will be discussed:

- Who is eligible for smallholder group certification? What is a smallholder? What if it is a group for big farms or in the smallholder group there are a few bigger farms?
- Risk assessment to determine minimum re-inspection rates.
- How do you plan an ICS tour in detail? How to select farmers for re-inspection, etc.
- Focus on critical control points (in addition to formal risk assessment to determine minimum re-inspection rate).

Who is eligible for smallholder group certification?

What is a Smallholder?

In the past different definitions were used to determine whether farmers are smallholders and thus eligible for smallholder group certification. The most common criterion used was size of land holding (e.g., smaller than 15 ha).

However, during all IFOAM workshops participants agreed that size alone was a poor indicator for being a smallholder in local context.

Therefore the following more general criteria were agreed upon for rough assessment whether a certain farm can be considered as smallholder farmer or not (→ see Document on IFOAM Smallholder Group Certification, compilation of results of 3 workshops).

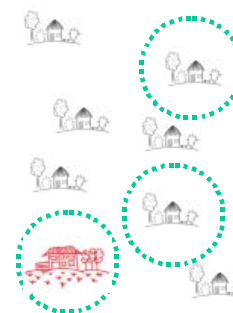
To be considered a 'smallholder farmer' the cost of individual certification must be high; as a certain guideline it was stated that more than 2% of sales value would be 'too high'.

Additionally 3 out of the 5 following criteria must be fulfilled:

- average income lower than \$5000
- managed mainly by family labor (not systematically dependent on hired labor)
- low tech production system
- limited capacity of own marketing
- limited capacity of own storage and processing

Obviously these criteria can only serve as rough guidelines. The idea is to assess these criteria for the group and possibly a few farmers that seem to be potentially bigger farms. It is not the idea that a certain farm is a 'smallholder' in one year and a 'farm' in the next year because he now has one additional field. But, e.g., in a group of farms with 2-3 acres rice each and maximum 15 acres total there are 3 farms with 20-25 acres rice and approximately 80 acres each. In this case above criteria can be used to determine whether they can still be considered smallholders or not (normally the result would be that they are NOT smallholders).

Inspection Schedule & Risk Assessment



- Who is eligible for smallholder group certification? Can bigger farms be certified in a smallholder group?
- Risk assessment to confirm risk categories and related minimum re-inspection rates.
- Other considerations (project sites, ICS centers, witness audits, etc.) to plan an efficient ICS inspection schedule.
- Focus on critical control points



Discussion: What is a smallholder farmer

- Discuss with participants what criteria they have used so far to determine whether a farmer is a smallholder farmer.
- Is it relevant to decide whether a farmer is a smallholder or not?
→ Yes, because all farms bigger than smallholders ALWAYS need to be inspected directly by the certification body.
- Were any criteria on size/complexity included in the assessment of whether a group of farmers could apply for group certification (with only a certain number of re-inspections)?

What is a Smallholder?



Smallholder or not?

1.1 To be considered a "smallholder" for smallholder group certification, the following should be fulfilled:

- The cost of individual certification must be disproportionately high in relation to sales value (>2% of sales).
- In addition, at least 3 out of 5 of the following requirements must be fulfilled:
 - Average income lower than app. US\$5000/yr
 - Farm units are managed mainly by family labor
 - Low-tech production system
 - Limited capacity to market on his/her own
 - Limited capacity for storage/processing

Attention: The EU guidance document restricts smallholder group certification to developing countries only (as defined by OECD)



Other requirements for smallholder group certification

In order to be certified according to the principles for smallholder group certification, i.e., with an ICS and with only a small percentage of farmers being re-inspected by the external certification body, two requirements must be fulfilled:

Within the group of smallholder farmers there must be homogeneity of members; i.e. the registered farmers are located in the same area and have similar production systems.

It is also necessary that the group have a common marketing system. The buying of products from the organic farms is the responsibility of the ICS.

Dealing with Bigger Farms

Case A: Group of farmers which all do not qualify as smallholders

How can such a group be certified? Is group certification possible or not?

In most cases it will be possible to certify such farms as a group. However:

- 100% of the farms must be inspected by the external certification body
- farms have to keep (at least simple) documentation on their own

Such a group of farmers can also have an ICS to assist farmers in documentation, to improve quality of production, and provide advice to the farmers and for common marketing.

Attention: there is a certain risk that if farms are actually quite complex and big, certain aspects are neglected if the farms are certified as a group. In principle the inspection time per farm and the expected level of farm documentation should depend on the complexity of the farm. I.e., really big farms within a group will still need more or less the same inspection time and need to keep the same documentation as any individually certified organic farm.

Case B: a couple of bigger farms in a smallholder group

How to deal with such bigger farms (bigger than smallholders) in a smallholder group?

- Need to be inspected externally each year (PLUS internal inspection) → important for inspection schedule
- Need to keep at least some basic farm documentation of their own (not only ICS docs)
- No self-marketing of the produce as organic!

Attention should be paid that problems in complex bigger farms are not overseen because they are part of a smallholder group. Often bigger farms have many more risks and critical control points than smallholder farmers in the same area! If such bigger farms are part of the ICS group, the ICS should also demonstrate competence in effective inspection of such farms. If the farms are too complex for the ICS to handle, they need to be certified separately.

Other requirements for group certification

So, can any group of smallholder farmers be certified according to the smallholder group certification system?

For example the organic farming association India applies for group certification of all their different members – would that be possible?

Other Requirements for Group Certification

1.2 Within the group there is homogeneity of members in

- geographical location
- production system
- size of holding

1.3 Common marketing system for the group



Discussion: How to deal with bigger farms

How is a group of bigger farms dealt with?

How are single bigger farms in a smallholder group dealt with?

→ Let participants come up with suggestions before presenting this slide

Group Certification Options for bigger Farms



Groups NOT qualified as smallholder group

- can still be certified as an organized group of growers
- can have assistance in documentation, joint marketing
- must have common marketing system
- each member farm has to be inspected by the certification body and has to keep its own documentation

4.3.4 Farms (bigger than “smallholders”) are certified as part of a smallholder group

- Each farm is inspected annually by both the ICS and the certification body.
- Each farm has to keep most farm documentation for itself
- Common marketing under responsibility of the ICS Operator (no farmer marketing his/her own farm)



Risk Assessment

Risk Assessment by ICS Operator

All organic ICS operators have to do an internal risk assessment at the beginning of certification. For existing operators who have not yet done one, demanding such a risk analysis from them is highly recommended. The internal risk assessment also provides deeper insights with regard to the critical points that the ICS is aware of (and what they are not aware of as potentially critical points).

The risk assessment should be the responsibility of the ICS operator, usually farm production as well as buying and handling.

Since many operators may not be experienced in writing a detailed risk assessment, it could be important to check the risk awareness of ICS staff in addition to the written risk assessment. Maybe they have not written down all relevant risks, but all ICS staff is in fact well aware of them. This is obviously a different situation than if nobody is aware of any risks.

A risk assessment checklist is included in the appendix to the IFOAM Guidance Manual for Producer Organizations that can be used as a tool by producer groups to come up with a list of risks for the project. As a second step the ICS then has to evaluate what it can do about these risks in order to minimize them and prevent potential risks from ever becoming actual problems.

The example on the slide shows a risk assessment for smallholder pepper growers in agro-forestry systems, prepared by workshop participants (producer organizations). Potential risks were listed for all different stages of the production process, which helped to collect potentially critical points more systematically, and the final list of identified risks was much longer and more useful than when simply asking the participants to come up with potential problems in general.

This slide shows a sample risk assessment done by the ICS. This example is also included in the appendix to the IFOAM ICS Guidance Manual for Producer Organizations. The table lists the major identified risks and what the ICS can do about them.

For example:

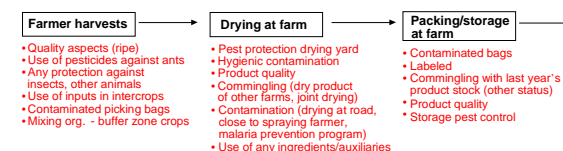
Identified risk = some farmers still grow vegetables chemically and all store prohibited inputs for those vegetables on the farm

What can be done about it?

- Train farmers well in organic management practices to increase their trust in organic production methods and to introduce conversion of vegetable crops.
- Inform about health hazards of the chemicals used.
- Clearly instruct farmers and check carefully that no vegetables are grown on the organic banana plots.
- Increase inspection/field extension presence on those farms which still have conventional vegetables.

4.1 Risk Assessment by the ICS Operator

- A detailed initial risk assessment has to be done at the beginning of certification (*first year of certification or when informed about this requirement by certifier*).
- Has to identify internal and external risks at farm level as well as during buying, processing, or (export) transport, while the product is under the responsibility of the ICS Operator.



Tool: Risk checklist in ICS Guidance Manual



Training Manual on the Evaluation of Internal Control Systems

Group Discussion

Discuss participants' experience with producer group's risk awareness. Is it common in existing ICS projects that they have a risk assessment? How good will a risk assessment be that is done at the beginning of certification? Will organizations already have enough knowledge to do a proper risk analysis?

Sample Risk Assessment by the ICS

Important Risk	What can we do about it?
Organic production of home consumption crops is difficult (requires more effort, and some of the organic farmers grow conventional vegetables for local sale and store agrochemicals in their house for use in their vegetable garden.	<ul style="list-style-type: none"> • Intensify training of the farmers regarding organic cultivation methods for home consumption crops • Make more frequent advisor visits with focus on vegetables • Inform farmers about danger of agrochemicals for their health and for the environment • Additional (unannounced) inspections in order to guarantee that no prohibited products are used in organic banana fields.
Organic treatments are organized by the cooperative and sprayed by airplane. If the planes are also used by conventional farms, there is a risk that residues of conventional products remain in the airplane and contaminate organic fields.	<ul style="list-style-type: none"> • Tanks of the plane are always cleaned at least three times before use. Ask certifier which products to use for cleaning • Elaborate an ICS form to document the cleaning
Many organic farmers have conventional neighbors who spray with backpack sprayers. In the community Villa del Carmen, the neighboring conventional farm is treated by airplane. There is a certain risk of contamination of organic fields, especially from aerial spraying.	<ul style="list-style-type: none"> • ICS needs to assure that buffer zones with conventional neighbors are planted. • If neighboring fields are treated by airplane, there needs to be a buffer zone of at least 50 meters. • The internal inspectors need to be instructed accordingly and include the information in the internal inspection checklist.
Some producers store old agrochemicals, which were a gift during electoral campaign 5 years ago.	<ul style="list-style-type: none"> • The internal inspector needs to be instructed to check the products stored by each farmer on the internal inspection form • All old products must be removed immediately. A solution has to be found on what to do with them.

See Appendix to the ICS Set Up Guidance Manual p. 5



Training Manual on the Evaluation of Internal Control Systems

Risk Assessment by External Certification Body

In the certification office the approximate risk category is determined by the certification body in order to prepare the overall inspection schedule. The minimum number of farm re-inspections is estimated and the inspector instructed how many farm re-inspections need to be done.

Normally the certifier will assume at least a high risk situation when going for first inspections, in order to have sufficient time for risk assessment and also to be on the safe side if it should be found during the inspection that the risk category was higher than foreseen.

The inspector receives the overall inspection schedule and preliminary risk analysis (and maybe a list of critical control points for inspection) from the certification office.

Based on the preliminary assessment and the overall findings of the ICS office visit and field inspection visits, the inspector completes the small chapter risk assessment in the ICS inspection report. In addition, it is recommended that the inspector prepare a complete risk assessment, e.g., by checking the list of potential risks as given in the appendix to IFOAM ICS Guidance Manual for producer groups. The inspector needs to be aware of all critical control points during his/her inspection. This will be usually considerably more than the actual risk assessment table in the inspection report that serves more to determine the formal risk category and hence justify the applicable minimum re-inspection rate.

Risk Categories

The EU guidance document (and the new IFOAM ICS inspection protocol) defines 3 risk categories: normal risk, medium risk, and high risk. The minimum number of farm re-inspections is defined according to the risk category.

The formal risk category can be determined with the help of the risk assessment table in the report. The inspector has to determine whether the listed potential risks are important actual risks for this project and add additional major risks if needed. The risk category is determined based on the number of identified risks:

1-3 risks → normal risk situation
3-5 risks → medium risk situation
more than 5 risks → high risk situation

Please note that if ANY major non-compliances have not been identified by the ICS, the operator is 'automatically' categorized as 'high risk'.

Risk Assessment by the Certifier

CERTIFIER: PRELIMINARY RISK ASSESSMENT

- Based on information from the project
- Based on knowledge of the crop, typical situation in the specific region, similar operators
- Needed to estimate necessary external re-inspection rate

INSPECTOR: RISK ASSESSMENT & CRITICAL CONTROL POINTS

- Based on internal risk assessment and overall inspection findings (ICS visit, farm inspections)
- Rather simple risk assessment in report (chapter 4.2) to determine minimum external control rate for authorities
- In addition to this formal risk assessment, inspectors should constantly think about potential risks and concentrate on these critical control points



Risk Categories for Determination of Minimum Re-inspection Rates

“Normal” risk (low risk)

Fewer than 1-3 identified risks (note that some risks have double weighting)
Example: Farmers also have conventional crops, farmers are not really convinced of organic farming, ICS staff has changed in past years

Medium Risk

3-5 identified risks
Example: Farmers also have conventional crops, farmers not really convinced of organic farming, ICS staff has changed in past years AND high incentives for farmers to sell non-organic products as organic

High Risk

more than 5 risks
and/or: any situation in which major non-compliances have not been identified by the ICS



Risk Categories & Minimum External Re-Inspection Rates

The minimum farm re-Inspection rates are calculated as follows:

N = total number of farmers in the organic project, i.e. all organic farmers, all conversion or 'passive' farmers. 1.2 and 1.4 respectively are the so-called 'risk factors'.

Minimum number of farms to be inspected in

- normal risk situations:
square root of N, in any case minimum 10 farmers
- Medium risk situation:
1.2 x square root of N; in any case more minimum 12 farmers
- High risk situation:
1.4 x square root of N, in any case minimum 14 farmers

For more information on determining the minimum amount of growers to be inspected based on the above formula and the number of group members, see "Re-inspection rates and planning" in appendix A of this training manual.

Additional to this very minimum number of farmers to be re-inspected, the following should be considered to calculate the necessary days for farm re-inspections:

- Farm re-inspection must be thorough and inspectors must have sufficient time for the ICS evaluation. Therefore not more than approximately 4-5 farm re-inspections per day should be planned.
- Additional time may be needed for risk assessments.
- If the groups has considerably different project sites (maybe with different critical control points, different intercrops etc.) it should be planned to inspect at least each project site, which also influences the overall inspection time schedule considerably.

What should be done if risk assessment during inspection results in much higher risk category than anticipated by certification office?

→ The inspector should check his/her inspection schedule. In most cases the planned number of re-inspections will be sufficient anyway to cover the minimum number (for high risk situation). This will be the case because certification bodies will be rather planning a bit too many re-inspections in the first year in order to be on the safe side.

→ If it is really found that a sufficient farm re-inspection cannot be done, the inspector should contact the certification office and possibly extend the inspection visit or schedule a second visit. It is strongly recommended to do the minimum number of re-inspections, otherwise problems with import authorities may arise.

External Farm Re-Inspection Rates

N = total number of farmers (org., conversion, passive)
The following minimum number of farms must be inspected

NORMAL RISK Rate= \sqrt{n} Minimum: 10 farms	MEDIUM RISK Rate= $1.2 \cdot \sqrt{n}$ Minimum: 12 farms	HIGH RISK Rate= $1.4 \cdot \sqrt{n}$ Minimum: 14 farms
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- Average number of farmers/day is 4-7 (depending on distance and size/complexity of the farms).
- If there are substantially different project sites or centers of internal inspection, farmers in every project site/center of internal inspection should be inspected to provide a representative picture of the group's activities and the ICS efficiency.
- For more details on how to choose farmers for re-inspection ⇒ Chapter 5 Re-inspections.



Training Manual on the Evaluation of Internal Control Systems

What to do if the Risk Category chosen by the inspector is higher than estimated by the Certification Body?

Problem: Preliminary Planning has been done by the certifier, but the inspector finalizes the risk assessment according to his/her findings and possibly determines a higher risk category than expected (and hence higher minimum number of farm re-inspections).

→ Check whether the planned number of re-inspections is still higher than the minimum number of re-inspections for the higher risk category. Normally, a few more farmers than the estimated minimum re-inspection rate should be planned in the first year anyway, so re-inspection numbers should probably be sufficient.

→ Otherwise try to cover the necessary additional number of re-inspections. A second inspection may possibly need to be scheduled.



Training Manual on the Evaluation of Internal Control Systems

Work Group Exercise Risk Assessment

Split participants in small groups of 3-4.

Each group is given a certain production situation that is well known to at least 1-2 within the group. The situation should be loosely defined by the trainer to have a diverse range of potential risks coming up in course of the exercise. The trainer should feel familiar with the production system in order to coach the risk assessment process and point out potential missing risks.

E.g., cotton production in rotation with sesame & peas. Project with 1000 farmers, each year approximately 50 farmers have to be excluded for use of prohibited inputs; project is still growing and more farmers will be registered. The ICS has detected all non-conformities, but ICS staff is changing regularly and hence not always well trained.

Or: agro-forestry spice garden with pepper, banana, cardamom, coconut, etc.

Or: rice production.

Each group discusses the actual project system (they can make assumptions if they have to decide on certain project details that are not given in the project description) and completes a detailed risk assessment checklist (appendix to IFOAM ICS Guidance Manual). Afterwards, the risk assessment chapter in the ICS report is completed.

Each group briefly describes the chosen project situation and lists all identified relevant risks (not the irrelevant risks). The chapter risk assessment is completed on the laptop (if available) during the presentation so that all participants can also see how to use the report format.

4. Inspection of ICS Office (Part 1)

The actual inspection of the ICS covers the following aspects, which will be presented in this chapter:

- Description of activities
- ICS structure & responsibilities within the ICS
- ICS Manual (is there a manual? – is it updated? etc.)
- Internal Organic Standard – is there an internal standard? – does it cover all relevant aspects?
- Documented & effective internal control procedures: registration, internal inspection, approval, & sanctions
- Qualification of personnel, are conflicts of interests avoided?
- Training of farmers

All these aspects can be checked in the 'ICS office' by document check, interviews with ICS staff, etc. However, many of these issues are checked again during farm re-inspection visits so that the overall impressions from farm re-inspection tours with additional risk assessment investigations and possibly witness audits confirm the 'first impression' from the ICS office audit.

It may even be a good idea to do part of the ICS office inspection first, then proceed to some farm re-inspection visits and then add some more time for finalization of the ICS office inspection.

Basic Description of Activities

For a complete assessment of large farmers groups and their ICS in just a few inspection days, it is absolutely necessary that the inspector receives a description of all activities and also specific information about all project sites. Such basic information is important for pre-evaluation of critical control points, for risk assessment, and for selection of potentially critical farmers for re-inspection.

The description also provides evidence that the ICS operator is AWARE of all its activities and specific characteristics of different farmers in the project.

Many organizations choose to give this overview in the ICS Manual itself because this facilitates understanding of the reader of the manual and because the manual then gives a complete impression of the organic project.

The description must also cover an overview of all handling steps from harvest to final sale, including information about who is responsible; e.g., is it the cooperative's own processing unit or is the product processed by contract processor? The names/addresses of all processors, warehouses, etc. must also be available. The overview must cover not only these steps but up to the sales by the ICS operator, i.e., all steps for which the ICS operator is held responsible.

Inspection of the Internal Control System in the ICS Office

Internal Control System (ICS)	
3.2	Description of activities
5.1	ICS structure & responsibilities
5.2	ICS manual
5.3	Internal organic standard
5.4/5.5/5.6	Documented & effective procedures for internal farm inspection, internal approval/sanctions
5.7	Personnel is qualified ; no conflicts of interest
5.8	Ensures training of farmers



Numbers refer to the sections and compliance criteria in the ICS report

Basic Description of Activities



3.2.1 An overview of the organic operation sites must be available, including a general overview of the farming system and agricultural practices of participating farmers

- May be part of the ICS Manual or as separate project description
- Description is important because inspector needs this information for a risk-based inspection approach
- ICS submits evidence that it is aware of all activities under its responsibility (all activities that will need monitoring)



3.2.2 There must be a description of all the steps that take place from harvest to final sales, including an indication of which entity is responsible for the product at each stage

- Make sure to consider all handling activities in the detailed inspection schedule at the beginning of inspection.

ICS Organization

Structure and Responsibilities

The ICS is a formal body within the certified operation. The certification body delegates part of its inspection responsibilities of this internal body, thus it is very important that the ICS have a clear structure and that somebody be in charge of each task.

Therefore the ICS has to have either an organizational chart or a table of responsibilities. An example of the table of responsibilities can be seen in the appendix to the IFOAM ICS Guidance Manual (page 24).

Also, one person has to be in charge of the overall internal control system and coordination with the external certification body. This position is called 'ICS Coordinator' in the Guidance Manual and this course. Other common names for this position would be 'Organic Manager', 'Organic Coordinator', 'ICS Manager', etc. This position includes more than just being 'chief internal inspector', but sometimes there may only be a 'chief internal inspector' who in fact has all responsibilities of an ICS coordinator. But it could also be that nobody is really in charge, and this must be corrected immediately.

The ICS coordinator is in charge of the functioning of the ICS but will delegate some tasks to qualified staff. The coordinator is usually in charge of coordinating both the internal and external inspections.

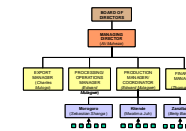
In addition to the coordinator, a person or body has to be responsible for making approval and sanction decisions. Often this is the ICS coordinator, but it could be another person within the organization. It is highly recommended to have some kind of internal approval committee, at least for sanction decisions. Even if there is no formal approval committee, it might be good to discuss sanction decisions in a group (e.g., of internal inspectors) to come up with an appropriate and well-balanced decision. The approval manager should not be involved in marketing & sales since this tends to end in quite a substantial conflict of interest; e.g., if it is the sales manager who has to deliver a certain number of tons by end of the month, he/she would find it difficult to sanction 50 farmers 2 weeks before harvest.

ICS Organisation



5.1.1 ICS operator has an organization's chart or table of responsibilities

5.1.2 One person has overall responsibility for the ICS and the co-ordination with the organic certification body.



- This position is usually called ICS-Coordinator
- He/She can delegate responsibilities so that for each procedure or task of the ICS, one person is in charge.
- Coordinates the internal inspection
- Coordinates with external certification body

5.1.3 ICS has assigned at least one person to take approval and sanction decisions

- Often = ICS coordinator, but may be somebody else; responsibility must be clear
- Better if it is more than one person taking the decision



Group Discussion: ICS Organization

Discuss with the participants what ICS structures they have come across. Is it normal that one person is clearly in charge of proceedings? Is it common for there to be clear responsibilities for both approval and sanctions approval?

Internal Inspectors

Another very important aspect to assess is the number of internal inspectors.

Often internal inspectors double as field officers. Inspection and extension should be done preferably for different regions, but not necessarily. This aspect will be discussed later in detail when discussing conflicts of interests.

It must be checked whether there are enough internal inspectors to perform a thorough internal inspection. An assessment of the time needed for internal inspections also provides feedback on the thoroughness of internal inspection and possibly even on the supervision focus of the ICS.

When assessing whether there are enough internal inspectors, the following information is needed:

- How many farmers are usually inspected per day (ask internal inspectors)?
- Cross-check this information with other information, such as how many farmers MUST be inspected in total by each internal inspector, what other duties the internal inspector has apart from inspection, how many internal inspections are to be done (some ICS operators plan for 2 internal inspections). How much time does he/she effectively have for the internal inspection?
- Assess average travel times and distance between farmers. How long will the average internal inspection take?
- Will this average time for inspection be enough for a thorough and complete inspection of that farm, possibly also considering fields far from the homestead?
- If inspectors are also field extensionists, will there be any time left for the actual field extension work?

In some cases, e.g., field officers are sent to farmers monthly and need to cover only 6-7 farmers a day, while for the internal inspection 15–25 farmers need to be done. This also demonstrates some of the importance attributed to the internal inspection as compared to the field extension. Possibly the regular 'extension visits' provide a very good continuous supervision of the farmer, but it is important to understand such aspects when assessing the overall ICS. Also the internal inspection HAS to be thorough and complete and cannot be reduced to the absolute minimum.

Motivation exercise: Number of internal inspectors

Ask participants how they would check whether there is sufficient number of internal inspectors for 100% inspection.

What would they consider 'sufficient'? How much time would have to be available for a thorough internal inspection (might depend on farm complexity, whether there are remote fields, etc.)?

(Some answers are given in the text on the left side, to be presented in case participants do not uncover all aspects by themselves).

Number of Internal Inspectors

5.1.4 There is a sufficient number of inspectors to perform 100% internal inspection each year



- Check how many inspectors, average number of farmers inspected by day .
- Can the internal inspections be thorough? E.g. if doing 20 Inspection per day once a year???
- Don 't forget to also consider time for other duties of inspectors (e.g. extension) when calculating whether capacities are sufficient .

Are 2 inspectors sufficient for inspection & training of 250 farmers?

The ICS Manual

The ICS operation has to have at least a simple ICS manual, i.e. a set of documented policies and procedures and forms for the internal control.

In many cases the operator may not have one 'manual' but rather a pile of contracts, forms, procedures, etc. It is up to the inspector to determine, in the course of assessing all different parts of the ICS, whether the 'manual' is complete or not. But it is important that some basic documents are available, which should include at least the relevant forms (contract, internal checklist, registration form etc.) and a description of procedures in order to be considered a manual.

For further development it is highly recommended that organizations organize all their different procedures and forms in an actual manual because it facilitates access for the inspector and it is much easier to manage (also, for internal staff, it is always clear which versions of documents are valid, etc.).

If there are no written procedures at all, find out whether the organization has standardized procedures, such as when everybody is aware of what is done when and what forms to use, what to keep in mind when doing this or that (i.e., there are procedures, but they are not written down) or whether there are in fact no standardized procedures.

'The Internal Regulation'

Many ICS operators have an 'Internal Regulation'. This term was introduced in the IMO/Naturland Manual on Quality Assurance in Smallholder Organizations, the first international manual on smallholder group certification. The 'Internal Regulation' normally covers the 'internal organic standard' (the organic farm production rules), plus the procedure of internal inspection and buying. I.e. the internal regulation plus related ICS forms can be considered to be the 'ICS Manual', even though some specific aspects may still be missing compared to what is demanded in the new IFOAM ICS protocol.

Note: when assigning these compliance criteria, the inspectors do not need to check whether the ICS manual is fully complete in all details; this will be checked in all respective chapters of the ICS inspection. It is only the assessment whether there is a set of documents and procedures available as a basis for the work of the ICS.

The second question is then whether the ICS manual is actually used. Are the forms as included in the 'ICS Manual' the forms that are actually used by the ICS staff? Is the ICS staff aware of the procedures written in the ICS manual, or is the ICS manual merely the document the ICS Coordinator presents to the external certification body?

This relates to other compliance criteria: does the ICS Manual in principle reflect the internal procedures? It is quite normal that there are minor differences between implemented procedures and the written procedures in the manual, but the manual should, in principle, reflect the real procedures and vice versa.

The ICS Manual



5.1.1 There is an ICS manual, i.e. a set of documented policies, procedures and forms for the internal control system (B)

- Often not organized as manual, only forms and possibly a few written procedures - OK for first inspection, but missing parts must be defined
- If for some activities no written procedures yet - ask about standard practices (whether they have standardized procedures even if not written down)



5.1.2 The ICS manual covers in principles all relevant procedures (and their documentation) (B)

- internal organic standard (farm production rules)
- farm registration, internal inspection, internal approval/sanctions
- selling/buying, product handling

rather general first / rough evaluation of completeness of manual



Effective Use of the ICS Manual



5.1.3 Internal ICS staff has up-to-date forms at hand and is aware of the valid ICS procedures as described in the manual (C)

- Do they have documents at hand?
- Are documents used up to date? (*some delay in starting to use a new form is acceptable*)
- do the ICS staff know their respective procedures (as described in the manual)?



5.1.5 The ICS Manual reflects IN PRINCIPLE the internal procedures (B)

- Overall assessment at the end of the inspection.
- Small differences are very common, but somehow there must be a link between written procedures and reality.



Updating the ICS Manual

The ICS Manual needs to be reviewed regularly and updated when necessary.

A good approach is to review the ICS Manual once a year, before the onset of the new internal inspection season. In such a case it would be included in the manual that the ICS manual is, e.g., revised each year in March.

To have a regular schedule for updating (not “continuously”) is particularly important if the farmers group is large. In smaller organizations with only 1-2 internal inspections, changes in ICS Manual (and thus in forms and procedures) are easier to implement, so changes can be introduced right when needed.

For certification bodies it is important to understand that changes in ICS procedures/forms will usually take some time and should not be expected immediately (unless absolutely required because organic integrity is directly threatened); too many uncoordinated changes in the middle of the internal inspection season may only lead to confusion or mistakes, or changes will simply not be implemented and be done only on paper to satisfy the certification body.

Changes are usually required if:

- it is found that the present internal procedure/form is inadequate.
- required by the certification body (certification decisions).
- there are important changes in the applicable organic standards.

If the manual is updated, how is the change documented (e.g., each ICS Manual is dated, or after each update the document receives a new version)? It is necessary that it is evident which version is the current one (which is not possible if there is NO date and NO version number on the documents!)

Updating of the ICS Manual

5.1.4 The ICS Manual is reviewed regularly and updated when necessary (B)



- e.g., updated each year before start of new season
- Manual will need to be changed if internal procedures are modified/improved.
- Manual must be changed if major changes in applicable regulations/standards.
- Manual may need to be changed because requested by the certifier (certification conditions).
- If updating - how is the new document approved and distributed? Version management?

The 'Internal Organic Standard'

The organic internal standard describes the relevant organic farm production requirements in simple and practical language. The standard is a local interpretation of the applicable organic standard(s) and usually also includes the specific quality expectations of the ICS Operator.

E.g., the ICS operator decides that only fully converted organic farmers (no conventional crops) may be registered for certification according to Regulation 2092/91, although this regulation would allow part conversion. Hence all respective parts dealing with part conversion, storage of inputs, etc., will be irrelevant and would not need to be included in the 'internal organic standard'.

The internal organic standard also serves as the reference document for the ICS to assess whether a farmer is working 'according to the rules' or not. This aspect may cause a bit of confusion if the 'internal organic standard' includes many aspects that the operator wants to improve or introduce in the future, but which are not yet implemented!

The organization HAS TO HAVE an internal organic standard. Often a simple/preliminary version of the internal organic production rules is included in the grower's contract. It is possible that some components, e.g. the rules for conversion of new farmers, may be included somewhere else, such as the ICS manual or in some 'technical guidelines for inspectors'. For assessing whether the internal organic standard it is of primary importance that information is given somewhere, but not necessarily in a specific document or chapter.

Many organizations also have the aforementioned 'internal regulation', which is the internal organic standard plus some additional procedures.

For first certifications and for simple standards it may be acceptable to use the external standard as basis for the ICS, but in reality very, very few operators (or even inspectors) will understand a complete organic regulation like the EU regulation, so working according to a standard that nobody understands and which is not directly applicable to the situation in developing countries in smallholder context is not really a good long term option. It is much better that the ICS operator writes its rules in its own words and the certifier assesses whether it is appropriate and sufficient for the specific production situation.

What is an Internal Organic Standard?



- Describes the relevant organic farm production requirements
- Is a local interpretation of the applicable organic standards „What do our members need to do to be organic farms? “
- Takes into consideration all applicable standards and own quality expectations
- Is written in simple, practical language in order to be understood by farmers and ICS staff

The Internal Organic Standard



5.3.1 There is an 'Internal Organic Standard' (B)



- Sometimes the rules of production are included in the contract. Some parts may even be somewhere else in the ICS manual → important is that the requirements are defined, not in which document.
- The term „internal regulation “ (IMO-Naturland ICS Manual) includes the organic production rules (= internal organic standard) but also some procedures, e.g. on registration.
- In some cases also the “external” standard can be accepted, if all requirements of the standard are effectively implemented in the ICS and are well known. Usually not suitable.

Content of the 'Internal Organic Standard'

The internal organic standard must cover all applicable aspects of all organic standards according to which the ICS Operator wishes to be certified.

This implies that the internal organic standard covers at least the following aspects in sufficient detail (for the specific production situation):

- Organic and non-organic farm unit: all aspects of full farm conversion or permitted part conversion, parallel production, separation of organic and non-organic units, etc.
- Soil management & fertilization (incl. inputs)
- Plant protection (incl. inputs)
- Seeds and planting stock
- Prevention of drift (buffers, etc.) and contamination
- Livestock husbandry (if required by standard)
- Post-harvest treatments/processing on the farm
- Handling of conversion period

Organic production rules to be included in internal organic standard

No additional text, since anyway highly dependent on certifier and organic standard.

Attention: certifier's interpretation may be slightly different for smallholder systems, e.g., some certifiers may simply not permit parallel production on smallholder level because it cannot be controlled well, even if parallel production would be acceptable for farms.

Minimum Content of the Internal Organic Standard



5.3.2 The 'Internal Organic Standard' regulates the following aspects:



- Organic and non-organic farm units
 - Soil management & fertilization (incl. inputs)
 - Plant protection (incl. inputs)
 - Seeds and planting stock
 - Prevention of drift (buffers, etc.) and contamination
 - Livestock husbandry
 - Post-harvest treatments/processing on the farm
 - Conversion period
- Are at least all minimum requirements of applicable standards (your certifier's interpretation) included, at least as far as relevant?



Training Manual on the Evaluation of Internal Control Systems

Motivation exercise: What are the most important production standard requirements relevant to typical smallholder projects?
Go through the following slides with participants and let them summarize the respective important requirements.
Note: interpretation of farm production requirements is highly dependent on the applicable organic standard and the certifier's interpretation!

Principles of Organic Production to be Included in the Internal Organic Standard (1)



NOTE: highly dependent on the applied standard & the certifier's interpretation of the standard

Organic and Non-organic Production Unit

- The farm has to convert all crops & areas to organic farming OR ensure a clear separation of organic and non-organic fields.
- All crops on the organic field must be managed organically.
- The same organic crops may not be also produced in non-organic quality.
- Separation of input storage, prevent any contamination of organic fields.

Sustainable Soil Management

- crop rotation, green manure, cover crops, mulching
- use of compost (plant residues, livestock manure)
- restricted use mineral fertilizers (list in standard)
- no chemical fertilizer (e.g., no urea)



Training Manual on the Evaluation of Internal Control Systems

Principles of Organic Production to be Included in the Internal Organic Standard (2)



Plant Protection and Weed Management

- Control of pests, diseases, weeds by appropriate cultivation measures (incl. crop rotation), mechanical measures, protection/propagation of natural enemies
- Restricted use of organic pesticides (list standard), no chemical pesticides
- No chemical herbicides, weed control by slashing/hoeing



Organic Seeds or Planting Stock

- Organic seeds/planting stock; conventional material only under certain conditions
- No GMO

Animal husbandry (if livestock not certified)

- Animal welfare
- Organic fodder where possible, no preventive medication, no contamination of organic fields

Harvest and Post Harvest Procedures

- Separation
- No contamination



Training Manual on the Evaluation of Internal Control Sys

Form of the 'Internal Organic Standard'

Language & Form

The internal organic standard must be written in a form that can be easily understood by all staff, in the appropriate language and according to their level of technical understanding.

Note: whether the ICS staff fully UNDERSTANDS the internal organic standard is a different control point; this compliance criterion concerns assessment of the internal standard (the document).

Standard for the farmer

The standard must be given to the farmers (at least in summary form) and organic farmers should be able to understand it. Some operators choose to prepare a special summary for the farmers (e.g., in the contract) because the complete internal organic standard would be too complex. Some chose to attach the full organic standard to the contract with the farmer. If all farmers are illiterate it may be appropriate to also distribute an illustrated version of the standard or really focus on intense farmers training rather than distributing a long and complicated standard.

Form of the Internal Organic Standard



5.3.3 The internal standard is written in a language and manner that can be clearly understood by all ICS staff (B)

- In language of ICS staff?
- Clear and ok to read for the 'typical' ICS staff?



5.3.4. The (summary of) the internal organic standards is presented to farmers in a language/form that can be understood by them.

- Summary can be given e.g. in contract
- Simple language? Available in local language?
- If farmers are not literate, are the requirements still communicated to them in an adequate way (illustrations/training)?



Training Manual on the Evaluation of Internal Control Systems

Understanding the 'Internal Organic Standard'

Obviously the ICS staff should be familiar with the internal organic standard and internal approval requirements.

It is very important that the ICS staff fully understands the internal organic standard and that everybody agrees what the organic production rules are. *It must be completely clear to inspectors which inputs are permitted and which are not and whether full farm conversion is required.*

The approval staff should also be aware of the external certification standard requirements, since in case of major deviations it is important to know the actual standard requirements in order to assess the severity of a deviation.

Example: the internal organic standard requires full farm conversion, but one farmer is found who has a separate conventional banana plot in addition to his organic coffee plot. The farmer will need to be sanctioned, but according to Regulation 2092/91 this part conversion would be ok, so the sanction will be less severe (e.g., only suspended for 1 year) than if he had grown conventional banana intercropped with the organic coffee (full de-certification of the coffee farmer).

Understanding the Organic Requirements



5.3.5 All ICS staff is trained, knowledgeable & competent in implementation of internal standard and internal approval requirements (B)

- Even if no formal internal organic standard yet available it can be checked whether staff is aware of all relevant requirements.



5.3.6 The internal approval staff are familiar with the overall standard requirements of the external certification standard

- Do they have the (external) certification standards available?
- Are they familiar with the most important requirements (even if slightly different to internal organic standard)?



Exercise: Assessment of an Internal Organic Standard (1.5-2 h)

Each participant (or small group) receives a sample internal standard and needs to check all relevant compliance criteria (note whether staff has understood them). If needed, the summary of certification requirements for EU-Regulation, NOP, Naturland, etc., can be used (appendices IV–VI of the IFOAM ICS Guidance Manual).

The participants (or groups) are asked to complete the respective chapter in the ICS report (pages of the report could be copied and distributed to all participants as separate sheets). Discuss the results or complete the report chapter on the computer as a group.

Notes for the trainer:

You can either use a real example of a known ICS operator or use the sample document 'Case Study I (Arabica Coffee Cooperative)' in the appendix to this training manual. One possible evaluation of the case standard is included in the example. Alternatively, you can use 'Case Study II (Spices)'.

If you chose your own example, the exercise is even more interesting if the participants receive a full ICS Manual and have to find out what parts could be considered an internal organic standard.

→ Remember to copy the chapter "Internal Organic Standard" of the report for all participants to fill in during the exercise.

ICS Documentation

Since smallholder farmers can often not be expected to keep their own documentation, as it would be required for certification, the ICS keeps all basic farm documentation for the farmers as well as the documentation of the actual internal control.

Documentation for each farmer

The ICS should have the following documents available, which will be all discussed in more detail later:

- Formal commitment agreement of farmers/Farmers Contract
- Basic Farm Data Form (Farm Entrance Form) with field history and last date of prohibited inputs. Usually filled in during registration of a new farmer.
- Overview maps and farm maps (if required)
- Updated production information (new fields, up to date list of inputs used, etc.) – in low key production systems this is often included in the annual internal inspection report. In some projects, farmers keep simple farm diaries.
- Notes on important advice given to the farmers, notes from field officers (e.g., field officer dairies, field officer weekly reports)
- Annual internal inspection report (inspection checklist)

Farmers Lists: Summary of Internal Control

The results of the internal control need to be summarized in detailed farmers' lists.

The farmers list has to contain the following details:

- name and code of farmer (and project site/village if not included in farmers code)
- total area under the organic crop (the crops to be certified), in case of mixed cropping number of trees may be more appropriate
- date of registration and date of last use of prohibited inputs
- date of internal inspection, name internal inspector
- result of internal approval process (internal approval status, e.g., "organic/conversion 2nd year")

Also there has to be a list of sanctioned farmers and farmers who have left the group. This list has to contain all details of the non-conformity found, kind of sanction and duration of sanction.

Minimum Farm Documentation



The following documentation is needed for each farmer. The documentation is usually kept in farm files:

- Formal commitment of growers to fulfill the internal standard (written contract)
- 'Basic Farm Data Form' / Farm Entrance Form with field history
- Update production information
- Maps (if required for single farmer)
- Notes on important training or advice given to the farmer by field officer / other important notes from field officers
- Annual 'Farm Inspection Checklist'



Summary of the Internal Control



5.4.10 The result of the internal control needs to be resumed as follows:



- **Farmers List with information on**
 - Name and code of the farmer
 - Total area and area under organic crop
 - Date of registration and date of last use of forbidden products
 - Date of internal inspection and result
 - Name of internal inspector
- **List of sanctioned farmers with reason and duration of the sanction**

→ Are farmers lists complete? Does the information correspond to the information registered in the farmer's documentation?



Evaluation ICS Documentation

Internal control systems are complex and to some extent each organization is unique. The group has most probably designed the documentation themselves and without special expertise in inspections and with regard to their own system and understanding. Therefore information is not always registered in the same way in various ICSs and not necessarily organized in the different documents as presented in this training course and the inspection protocol.

It is therefore important to first understand the ICS's own system completely before starting with the evaluation of single documents. E.g., some details may be missing in the registration form, but instead they are described each year in the internal inspection report.

Also the level of detail given and the way of presenting the information may vary quite a bit. As a general rule it can be said that the more 'low-key' the production system, the simpler and maybe 'imperfect' (according to the opinion of the inspector) the documentation may be. The more complex the situation becomes, the more accurate and well developed the documentation must be.

Example:

If coffee farmers use basically no inputs it may be acceptable to ask only in the annual inspection report about inputs used and only maybe with a question like "any prohibited inputs used?"

On the other hand you would expect more details in an inspection report of an organization where farmers use 5-10 different inputs including microbial preparations and copper and also have a rotation of organic crops while also having non-organic fields. In this last case it will even be required to update farm data for each year and farmers may even have to keep diaries on their input use!

Evaluation of ICS documentation should start already before the inspection. Ideally the ICS forms will already have been available to the inspector before the inspection so preliminary screening of the completeness of the forms can be done during preparation.

During inspection the evaluation can be done in detail and open questions clarified with the ICS Coordinator. Seeing the completed documents in the farm files also provides good feedback on the format of the documentation. Is the form clear enough that everybody fills in the information more or less the same way? Are there any lines on the documents that are never ever filled in because, e.g., the inspector has never understood the question?

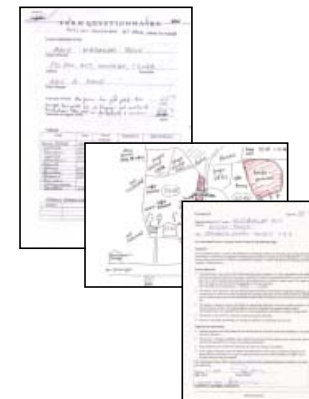
Sometimes the forms are perfect (because a well trained consultant has designed them) but too complicated to use for the ICS staff and therefore not completed well at all. In some cases a simpler system that is well understood and completely filled in is much better than the most elaborate but inadequately filled in set of documents.

General Aspects of the ICS Documentation



- As internal control systems are complex and documentation individually designed, the information is not always registered in the same way (in the mentioned documents).
- If you do not find the information as shown in a particular form, check if it is available in another document (e.g. the plot list is not registered in the farm entrance form but each year in the internal checklist).
- In low-input-systems, minor deficiencies of the documentation can be accepted (e.g. if the quantities of inputs are not registered) but the more complex the inputs, the more details are needed.

Evaluation of the ICS Documentation



- Ideally ICS forms are available to the inspector before the inspection
- Evaluation of the forms starts usually with preparation of the inspection
- Assessment is continued during the ICS office inspection when seeing how the forms are actually used

Exercise: Evaluation of ICS Documents

Instead of presenting all requirements for the various ICS documents in detail, it is recommended to do the following group exercise and let the participants get familiar with the requirements themselves by using the ICS inspection report chapter (Chapter 5.4) and the related parts in the 'ICS Compliance Criteria Document'.

The exercise can be done individually or in small work groups. If inspectors are still quite inexperienced in ICS inspections, it may be more interesting and appropriate to do the work in groups of 2-4 people.

Again, the trainer can prepare his/her own sample documents for this exercise or use 'Case Study I Coffee Union XXX'. In order to assess the different ICS forms (contract, farm entrance form, internal inspection report, farmers list) it is recommended that participants first read the whole ICS manual in order to understand the organization's situation before assessing whether the documentation is complete & appropriate.

The participants shall evaluate each of the received ICS documents in detail. Open evaluation: Are all minimum aspects covered? What do you notice about the forms? Are they appropriate and well designed? Are there any apparent problems with this form?

4.1 Inspection of the ICS Office 20

Exercise: Evaluation of ICS Documentation
Case Study I, Coffee Union XXX

Received documents:
Complete ICS Manual, incl.
- Contract
- farm entrance form
- Internal Inspection Report
- Farmers list (1 sample page)

Evaluate the following documents
(overall comments)

- contract
- internal inspection report form
- Farm Entrance Form
- Farmers list

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Note: depending on the results of the previous exercise, it may or may not be necessary to go through the following requirements regarding ICS Documentation in detail.

Commitment Declaration / Farmers Contract

The farmers contract needs to include the

- a) obligation of the farmer to
- comply with the internal organic standard.
 - give the inspector access to the fields, stores, documents, etc.
 - accept sanctions in case of deviations.

b) organic production rules (at least a summary).

For each farmer, a signed contract must be available before purchasing his/her produce.

In the report, the requirements for the contract are split into 2 compliance criteria because some aspects are A-category (= absolutely necessary) and others are B-category (i.e., contract form can be revised for the coming year to include these components).

Often, the farmers contracts also cover a couple of other issues, which are recommended, but not compulsory for the organic ICS certification.

This could be, for example,

- a written list of obligations of the ICS operator (provide advice, coordinate inspection)
- prices & quality requirements
- rules for leaving the organic projects, etc.
- a system that farmers have to notify the ICS if they find fellow organic farmers deviating the standards.

Commitment Declaration/Farmers Contract



5.4.1 & 5.4.2 The written contract (commitment declaration) needs to include:

Obligations of the farmer:

- to comply with the requirements of the internal organic standard (A)
- to give access to the fields, stores and documents (B)
- to accept sanctions in case of deviations (B)

Organic Production Rules

- summary of internal organic standard or reference to internal organic standard (B)

For each farmer a signed complete contract must be available before buying



The Farmers Contract



Other aspects often included in the contract

- ICS operator to provide advice to the farmers and to coordinate the internal and external inspection and to organise the purchase.
- Prices, product quality requirements.
- Rules for leaving the project / cancellation of contract.
- Farmer needs to announce non-conformities of fellow farmers to the ICS.



Contract or commitment declaration?

Some operators chose to sign the complete contract with farmers only shortly before the farmers reach organic status and their produce will be bought. Reason for this could be, for example, that otherwise farmers would have expectations that their product is being bought during the conversion period, which might not be the case.

In such a situation the farmer needs to sign at the beginning of his/her certification (=registration) at minimum a commitment declaration that he/she will adhere to the organic rules.

In this example the farmer signs in the 'Farm Entrance Form' that he/she intends to actively participate in the organic project. He/she binds him/herself to work according to the current XXX-organic production standard, not to use any chemical fertilizer or pesticide, and to follow the advice of the field officer.

Just before first harvest, the farmer then signs the complete contract, which gives details on production rules and on prices, obligations of the buyer, etc.

The 'Basic Farm Data Form' (or 'Farm Entrance Form')

The basic farm data form, which is completed for registration of a farmer, needs to include the following:

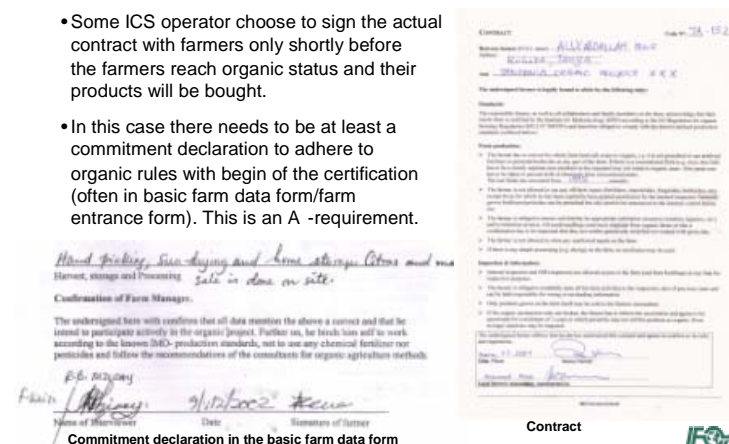
- Registration of data of the farmer: name, address, code (A)
- Description of all areas under management of the farmer (B):
- Organic crops and their respective area or number of plants (B)
- Number of animals (B)
- The date of the last application of prohibited inputs (A).
To obtain reliable information on the last use of prohibited inputs it is highly recommended to register all crops of previous years (for all plots) and then ask more specifically about inputs used for these previous crops. *E.g., if a farmer has grown tomatoes or cabbage (or any local risk crops) between the young coffee plants, the inspector can ask a bit more specifically what was used on this these high risk crops rather than just asking farmer "when did you last use chemicals?"*

The plot registration especially is critical! The ICS tends to focus on the export crops only, or may only ask about the plots around the homestead and may forget to ask about other plots of the farmer. It is important that all fields (also with non cash crops) are registered and the ICS understands how these other crops are being cultivated.

Also, it is often quite tricky to list all different plots and fields in a systematic way in a plot list, especially when farmers don't have names for their plots and rotate fields over large land holdings. In some cases it may even be better to have an annual farm maps and indicate all plots with acreage rather in a map than in a plot list.

Contract or Commitment Declaration?

- Some ICS operator choose to sign the actual contract with farmers only shortly before the farmers reach organic status and their products will be bought.
- In this case there needs to be at least a commitment declaration to adhere to organic rules with begin of the certification (often in basic farm data form/farm entrance form). This is an A -requirement.



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The Basic Farm Data Form



5.4.3 & 5.4.4 The basic farm data form/farm entrance form needs to include:

- Registration data of the farmer: name, address, code (A)
- Description of all area under management of the farmer (B)
- Organic crops and their respective area or number of plants (B)
- Number of animals (B)
- The date of the last application of prohibited inputs must be recorded for all plots (A)
- **Plot/area registration is critical. List of all plots may be most appropriate. Sometimes better to describe the situation per crop or to indicate the cropping information in maps.**
- **System must be adapted to the situation and must allow an overview of ALL organic/non-organic fields and crops under management of the farmer (→ also fields for non-certified crops)**
- **In many cases it is better to record field history for each plot (crops of past years) than just the last date of application of prohibited inputs**



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Maps

Overview maps

The absolute requirement regarding maps is to have a farm overview map on which each organic farm is localized with farmer's code (or name). In principle the map should allow the inspector to find the farm or to verify during inspection that he/she is actually standing on the registered farm and not somewhere else (in addition to what people may tell the inspector).

Therefore the overview map should indicate roads, landmarks, etc. If organic farmers are directly neighboring each other this should be seen from the map. Single conventional neighbors in between a group of organic farmers should also be indicated. The map must be dated.

Individual Farm Maps

The question of whether detailed farm maps are necessary for smallholder group certification has given rise to many heated discussions. Some certifiers think such farm maps are absolutely necessary, others think they are dispensable. The reality is that mapping is extremely difficult & tedious for smallholder groups, and the results are usually quite lousy and not necessarily very useful for inspection.

IFOAM has therefore taken the clear position that individual farm maps are only compulsory in the following situations:

- the farm has rotating annual organic crops
- the farm also has non-organic activities close to the organic plots (e.g., less than 3 km from organic fields)

Farm maps can be combined for neighboring farms if appropriate. They should show landmarks and allow the organic fields to be recognized.

Areas with potential risk of drift should be indicated and also all non-organic fields marked clearly as such.

This sample map indicates two neighboring farms with their respective code number 02-05 and 02-06. The non-organic maize fields are indicated in red. Within the homestead plot, smaller fields of annual crops (ginger) are indicated with their respective acreage under that crop. The perennial crops are only mentioned roughly ('coffee, banana, fruit trees').

Maps



5.4.5 An Overview map (village or community map) must be available (A-B)

- shows the location of each farm with the code numbers for each farmer



5.4.6 If rotating annual crops are grown or if there is a conventional farm unit, there must be a farm map for each farmer (B)

- Needs to show each plot/field and the respective crops
- Neighboring fields, their cultivation system and risks of drift should be indicated
- Landmarks and streets/paths should be indicated
- Neighboring farms may be combined – if still possible to identify each plot and its crops

All maps must be dated



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Discussion: Farm Maps

Ask participants what their experience is regarding farm maps. Are farm maps in smallholder groups a useful tool during the inspection? How good is the quality of such maps? Can they imagine doing the inspections without maps or perhaps are even used to doing the inspections without maps?

Discussion of sample maps

If the picture of the sample maps is big enough, participants could be asked to comment on the presented map formats.

Sample Map



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The 'Internal Farm Inspection Report'

The internal farm inspection report is obviously a very important document. Often it is not evident which information is listed in the basic farm data form and which information in the annual internal inspection report (e.g., some internal inspection report forms always check again the complete field history, etc.).

The internal inspection report must include at least the following:

- Evaluation of farm production: fertilization & soil conservation, plant protection measures, seeds/planting stock, all use of inputs, sustainability of production.
- Evaluation of contamination risks such as pesticide drift from conventional neighbors or farmer's own conventional fields or use of sprayers for organic as well as non-organic applications. All special requirements in case of part conversion must be checked if applicable (e.g., separate storage of inputs).
- Checking animal husbandry (if required by standard even if livestock is not certified).
- Yield estimates: usually collected during internal inspection, but there could be an alternative system to collect yield estimates, e.g. 2 weeks before harvest by the field officers. Still the internal inspector should do at least some spot check verification of whether, e.g., last year's delivered quantities are realistic, whether last year's harvest estimation was more or less accurate, etc.
- The internal inspection report should also cover all harvest & post-harvest handling, e.g., simple processing on the farm (drying of spices, de-pulping of coffee, de-husking of coconuts, etc.) or storage of the products. The critical control points for post harvest handling are possible commingling with non-organic products (uncertified crops, e.g., of brother of organic farmer) and contamination (storage pest control, use of contaminated bags etc.).

The internal inspection report form also needs to include a section with a clear compliance statement. The compliance of the farmer is evaluated, sanctions or conditions are proposed, fulfillment of last year's conditions is verified, etc.

Sometimes the internal inspection report form already contains a section for the final approval decision to be filled in later by the approval manager.

We have seen an example for such a compliance check in the inspection report of 'coffee union XXX'

Motivation exercise: Content of internal report form

What aspects need to be covered in the internal farm inspection report form? What must be checked in the internal inspection and documented in the report?

Content of the 'Internal Farm Inspection Report'



5.4.9 The 'Internal Farm Inspection Report' covers all certification-relevant farm aspects



- ✓ Evaluation of cultivation measures: fertilisation & soil conservation, plant protection measure, use of inputs, use of seeds
- ✓ Verification if there is a risk of contamination (drift, storing of inputs, use of sprayers etc.)
Measures in case of part-conversion
- ✓ Sustainable animal husbandry (if required by standard)
- ✓ Yield estimates (can also be kept in separate documentation)
- ✓ Harvest and post-harvest handling (if relevant)

The report checks management of all crops (like the inspection) with main focus on the organic plots and all crops on these plots.



Compliance Check in the Internal Farm Inspection Report



5.4.9 The internal inspection report should make a clear compliance statement



- Evaluation of the compliance of the farmer with internal organic standard
- Determination of sanctions in case of non-compliance
- Evaluation of the fulfilment of previous conditions
- Signed by the farmer and the internal inspector
- *Contains sometimes also approval decision of the organisation*



Update Farm Records

Usually farm registration forms are only filled in during registration, i.e., in the first year of certification. In the following years there is in many cases no actual update information on the farming activities if farmers do not keep any kind of farm diary themselves.

Such a situation is in principle acceptable if the annual internal inspection report also gives some update information on the farming activities AND if the production system (and hence also the documentation requirements) are very simple/low-key. If the internal inspection report is the only update on farm information it must cover explicitly:

- any change in area: new fields/fields rented out, etc.
- use of inputs (which inputs, not only whether they are 'OK' or not).
- harvested quantities

In case of complex production systems and in particular if farmers use quite a number of external inputs or if cultivated areas change every year, there needs to be some update information available on

- cultivation measures
- use of inputs
- harvested quantities
- changes in area

If really substantial quantities of external permitted inputs are used, continuous recording is necessary, e.g., in farm diaries that are kept by the farmer and/or the field officer.

In this case it is also important to consolidate data for the internal inspection report (list all inputs with quantities used per year in the internal inspection report).

Checking farm files in the ICS office

During the ICS office visit it is very important to check all ICS documentation not only as empty forms, but to carefully screen all farm files (ICS documents for each farmer). During this you can:

- assess the used forms (format and the use of the format). Are documents filled in completely and correctly and signed?
- spot-check whether all farmers have really been inspected (have internal inspection report).
- check for suspicious documents (e.g., all documents filled in with the same blue pen and look as though they never left the office for a minute).
- see if all documents are available for each farmer (spot check) .
- determine whether all documents for a certain farmer are consistent. E.g., Are last use of prohibited inputs and total area the same on farm registration form, internal inspection report, and farmers list?
- Cross check with list of sanctioned farmers – can you find any information about the non-compliance in the farm file?

Always make sure to check farm files of all different internal inspectors and/or centers of internal inspection.

Update Farming Records (5.4.8)

Records in case of low input use

- Sufficient to register the following information in the annual internal control checklist:
 - Use of inputs (incl. home made preparations)
 - Harvested quantities
 - New fields/changes in area
- Better: a farm diary kept additionally by the farmer

Records in case of high use of inputs or complex production systems

- Annual update information needs to be available:
 - Main cultivation measures
 - Use of inputs (seeds, fertilizers, pesticides)
 - Harvested quantities
 - Changes in area
- Continuous recording necessary (either farmer or field officer)
- Information needs to be consolidated (in farm inspection report or annual update questionnaire)



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Motivation exercise: Farm files

Checking farm files (ICS documents for each farmer) is an important part of an ICS office inspection. What kind of information can you get from checking farm files?

→ Then present slide

Verification of the Farm Files at the ICS Office



- Do forms correspond to minimum requirements, are all relevant topics addressed?
- Has each farmer received a documented internal inspection visit?
- Are farm files complete and all required documents available for each farmer?
- Are documents filled in completely, signed and dated? Does the ICS seem to know how to use the form?
- Are documents for one farmer consistent with each other and consistent with Farmers List?
- Can sanctions be seen in the farm files?

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4. Inspection of the ICS Office (Part 2)

Internal Inspection

Internal inspections are certainly one (if not THE) core element of an ICS. Assessment of internal inspections starts in the ICS office, but obviously more information is obtained during farm re-inspections.

Each registered farmer is inspected by the ICS at least once a year. The inspection is documented.

The actual role of the internal inspection for the overall quality assurance by the ICS depends a bit on the project's specific situation, but in any case (even with supervision mechanisms that function well), the internal inspection is very important because it replaces the complete formal organic farm inspection by the external certification body.

Difference between an internal inspection and an extension visit

Before we discuss internal inspections any further, it is important to understand what distinguishes an internal inspection from an extension visit. The difference is particularly important when all farmers are visited rather regularly by field officers, so the question may arise, is it only a formality to call one such visit 'internal inspection'?

Also, field extension visits can have very different focus and content. The focus may be on actual organic farming methods (because farmers need a lot of support) or rather on improvement of product quality. Or sometimes field extension visits are planned not for providing advice to the farmers, but instead because the ICS Operator feels that farmers need constant supervision in order to 'behave well'.

So what makes the 'internal inspection' different from other normal visits to the farmer?

- The internal inspection is a COMPLETE compliance check of all aspects of the internal organic standard; i.e. it covers ALL aspects of the standard while typical field extension visits may focus more on specific current issues. Compliance is also checked for the whole production year, while during extension visits the focus may be, e.g., on the problems/issues of past few days or weeks and not necessarily on the overall picture. Also, normally the fields will be visited much more intensely than during extension visits (which often just include an informal short visit of the farmer in his/her house).
- Since the internal inspection replaces the external inspection, it is a formal, standardized, well documented, neutral verification of compliance against a certain agreed standard.

IFOAM clearly emphasizes the importance of appropriate farm training, which can be achieved by a well organized field extension system. By no means should the focus on field extension be reduced by too much focus on internal inspection, yet internal inspections are one of the areas in which the efficiency and the quality of the ICS needs to be demonstrated to the certification body.

Internal Inspection

Each registered farmer is inspected by the internal control at least once a year. The inspection is documented.



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Motivation Exercise: Difference between Inspection and Extension

Ask participants what the difference is between an internal inspection and an extension visit. They may be done by the same person (probably in different regions), both include a field visit, discussions with the farmer etc. And since inspection may also include some advice and a non-conformity may be detected during an extension visit, what is the difference?

Difference between Inspection and Extension?



- Internal inspection checks compliance with ALL aspects of the internal organic standard
- Covers more than an average extension visit with focus on advice and documentation
- Internal inspection is substitute for external inspection of each farmer, thus it is a formal and documented complete check of the whole farm and its activities by a neutral person

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100% internal inspection

100% of all farmers must be inspected each year by the ICS. If necessary, an internal control season may be defined with the operator (if calendar year not suitable). This means that ALL registered farmers are inspected. Organic farmers, farmers in conversion, even passive and sanctioned farmers (all farmers from whom no purchase is planned, but who shall remain in the organic certification program). It also includes any bigger farms in the group, even if they are also inspected annually by the external inspector.

In the case of annual crops with more than one production cycle per year, it may be necessary to have one inspection per growing season. Since many tropical plants have a rather long time between planting and harvest and yet are certainly not perennials (e.g. banana), it may be easier to say crops with less than 8 months between planting and harvest fall into this category.

If there are many short cropping seasons, possibly even overlapping for different products, two internal inspections will still be considered sufficient. It is important to keep in mind that even European and American farms are not inspected once per growing cycle for all of their crops!

Most commonly there will be one, maximum two, compulsory internal inspections per year.

In many cases it might not even be recommended to have a second internal inspection visit. This is particularly true if ICS resources are limited (which they normally are) and the second internal inspection is done instead of thorough extension visits. Also, in this case internal inspections tend to be a rushed affair, a compulsory formal exercise rather than a meaningful complete inspection.

What should be done if the internal inspection is not yet 100% finalized during the external inspection?

Everybody agrees that it is best to come for external inspection after full finalization of all internal inspections. However there are many aspects to consider when planning the time for the external inspection and it also may be important to come at slightly different times in the production year. 100% inspection may not be meaningful or achievable early in the year. Also the ICS inspections must be done throughout the year and not only towards the end of the year. After all, the external inspection mainly assesses the ICS and this can be checked each year at any time.

As a general rule it is, however, recommended to ensure that 60% of internal inspections are already finalized before the external inspection.

In such a case, it is very important to assess the internal inspection schedule. Are they behind schedule? Were the internal inspections planned to take place in different stages in the production season). It is realistic that the operator will achieve 100% inspection in time (=normally before harvest)? Is the ICS Coordinator capable of ensuring that his inspection plans will be effectively implemented?

If you come 1 month before harvest and they have done only 60% of the inspection this will be a clear non-compliance, but if there are still 4 months before harvest and they have done 60% and Have a well organized schedule for the internal inspection, the compliance criteria would be fulfilled (but comments are needed).

In any case the group needs to submit a complete summary table (farmers list with date internal inspection) by an agreed-upon date.

Motivation exercise: 100% internal inspection

What does 100% inspection mean?

And what would you do if you come for inspection and 100% internal inspections have not been completed yet?

100% Internal Inspection



5.5.1: 100% of all growers are inspected annually by the ICS



- I.e., ALL registered farmers: active farmers, conversion farmers, new farmers, passive farmers (remain in the organic program but no purchase planned for respective year)
- In case of annual crops (time from planting to harvest is less than 8 months) there has to be one inspection per growing season (if many short seasons → twice/yr sufficient)
- If the internal inspections are not yet finalized at the time of inspection, will the ICS be able to finalize 100% inspection in time? ⇒ will need to submit proof on 100% inspection

- Check farmers list (should contain inspection details)
- Ask ICS Coordinator for current overview of inspections
- Understand how the system ensures 100% inspection

What does complete internal inspection mean?

A complete internal inspection must always include a physical field visit and an interview with the farmer.

The inspection should cover all of the following aspects:

- Inspection of organic fields, spot-checking of non-organic fields run by the same farmer (if any). Not ALL organic plots of a farmer must necessarily be inspected each year, but, if not, the ICS should have a documented system to ensure that each organic plot is inspected at least every other year.
- Inspection of harvest activities, processing, and handling: normally the internal inspection is before harvest, but the processing & storage facilities can still be inspected and the farmer interviewed about his/her handling practices.
- Inspection of livestock (if required)
- Boundaries of the organic fields to check on risk drift problems/risk of contamination from non-organic farm equipment, etc.
- Input storage
- Farmers records (e.g., farmers diary) if farmers keep documents. During internal inspection the continuous data is consolidated for the internal inspection report.

In principle it is not acceptable that internal inspections are done without field visits (even if organic fields are remote). If there are real problems in reaching the farm, exceptions are always possible, but not as a general rule.

Attention: this can really be a problem. There is a nice inspection report, countersigned by the farmer, all looks perfect and at some stage it is found that the internal inspector has never been out on the farm because farm is a long distance to walk, etc. This is one of the reasons why a fair re-inspection tour should always include some remote/impractical farms!

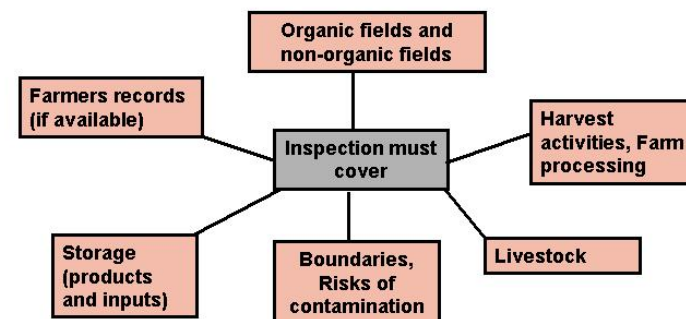
In some cases the internal inspection checklists are even filled in during a farmers' group meeting, not even with single interviews. Even in really low-risk situations such an 'internal inspection' is not acceptable!

It is also unacceptable that the internal inspector do all his/her inspection alone in the fields without interviewing the farmer. Ideally the inspector should go to the fields together with the farmer. If this is not possible in every single case he/she should both visit the fields and at another time interview the farmer.

Motivation Exercise: Internal inspection

In order to assess whether internal inspections are complete, it is important to first agree what a 'complete' internal inspection is. What has to be checked in an internal organic inspection?

What has to be Checked in the Internal Inspection?



The internal inspection always includes a physical field visit and an interview of the farmer (or representative)

But what if the farmers do not live near their organic plots? Would it be acceptable for internal inspections to be done only by interviewing farmers in the village?

Or what if it is evident that inspector has visited the fields, but has not talked to farmers at all?

Internal Inspection of Critical Control Points

One common weakness of internal inspections is that everybody focuses only on the organic cash crop and completely forgets about other crops, EVEN if these other crops are grown on exactly the same land (intercropping or rotation crops). This even includes the use of treated seeds, etc., on the organic plot (for inter-crops).

Another critical aspect is the registration of fields. It is quite common that the ICS only registers the most obvious plot for production of the organic cash crop (e.g., the plot around the homestead with many pepper vines). However it is important that the ICS at least knows all other plots and activities of the registered farmer (incl. which inputs are used for the non-organic crops, which spraying equipment used, etc.).

It must be ensured that there is no parallel production (e.g., farmer might have conventional 'coconut plot' 1 km away, and later it is found that there is also some pepper intercropped, which has always been mixed with the bigger quantity of organic pepper from the homestead plot.

The very minimum is registration of the non-organic fields and activities; usually the conventional fields should be spot checked, in particular if there is any risk of parallel production.

Note: this aspect may, strictly spoken, not be a problem for NOP certification, but in reality parallel production on smallholder level is practically impossible to handle, so it should not be permitted.

Effectiveness of the internal Inspection

One of the major aims of an ICS inspection is to evaluate the quality and effectiveness of the internal inspections. If the internal inspections are weak and not compensated by other effective control mechanisms (as discussed, non-compliance may also be discovered during extension visits, by announcement of other farmers), the whole idea of an internal control system instead of effective external control is at risk.

So, the most crucial compliance criteria of all is that internal inspections must be thorough. All non-compliances with the internal (and external) organic standard must have been duly identified. If you find (usually during farm re-inspections), that the ICS has failed to detect minor or major non-conformities on the farms, additional investigation is needed (→ will be discussed in chapter 'Evaluation of Non-compliances').

Results are documented in the inspection report. The form has to be signed by the internal inspector (A) and the farmer (B). Non-conformities must be communicated to the farmer and the ICS's own conditions followed up on.

If non-conformities are found outside the actual internal inspection visit (e.g., field extensionist visit) this also must be duly documented and the same approval/sanction procedures must be followed. Other control mechanisms may compensate for weak internal inspections at least in the short term, but internal inspections need to be improved immediately.

Motivation exercise: Critical control points in internal inspections
What might be some typical weaknesses of an internal inspection? What components is the internal inspection likely to leave unattended? Is there normally a gap in detection techniques?

Critical Control Points of Internal Inspections



Have all crops that grow on the organic fields been checked?

- e.g., intercropping conventional cardamom in the organic pepper plot
- is production of all crops on the organic plot(s) checked?
- incl. seeds of intercrops in organic fields

Are all fields that are managed by the farmer registered?

- no parallel production
- overall activities of farmer must be known
- be aware of inputs for conventional fields (where stored???)
- important to know for various private organic standards
- registration is the very minimum, and usually a spot check of conventional fields is required (if they are close, they shall be checked)

Effectiveness of the Internal Inspections

5.5.5 Internal inspections are thorough; all non-compliances with the internal (and external) standard have been duly identified.

5.5.6 appropriate sanctions are communicated to the farmer. ICS has followed up.

5.5.7/8 The Inspection report is completed and signed by inspector (A) and by the farmer (B).

5.5.12 Non-conformities found by extension etc. (not during internal inspection) are also documented.



Yield Estimates

One important tool for quality assurance is to have yield estimates and countercheck them during purchase.

Therefore the ICS has to have a system to estimate the yield of each farmer before harvest. Normally this also includes some reasonable 'rule of thumb', i.e., a clear range of normal yield estimates per acre (or plant) which can be counter-checked by an external inspector.

The yield estimates will not be perfect, but they must be reasonably accurate, especially over time (with growing experience). The closer to harvest the estimates are made, the more accurate they tend to be. The higher the risk that farmers really will deliver produce other than their own, the better the yield estimates must be.

If internal inspections are timed at different risk phases within the production system, a very accurate system to estimate yields is to send out field officers right before harvest for a complete round of yield estimates which are consolidated by the ICS Coordinator with the certified farmers list to a final separate 'buying list'.

Challenges in obtaining good yield estimates are climatic factors, farmers who are not used to accounting and also don't know how much they produced last year, farmers who are reluctant to disclose yield figures (for fear of tax, or because they also sell to other traders), and internal inspectors who are not well trained in making yield estimates.

Discussion: Yield Estimates

Do you think yield estimates are important? Should yield estimates be compulsory? When and how are yield estimates usually collected?

What is your experience with regard to quality of the yield estimates for smallholder farmers? What might be the challenges in obtaining correct yield estimates?

Yields

5.5.9 There is a system to estimate yields before beginning harvest

- by field officers and/or
- during internal inspection, etc.

5.5.10 Yield estimates are reasonably accurate.

5.5.11 Yield estimates are ready before harvest



Approval and Sanction Procedures

Approval Procedures

After the inspection, there has to be a system to approve or sanction farmers. Most ICSs have some kind of experience in sanctioning farmers but APPROVAL procedures are not always also in place.

Approval means that the responsible approval manager briefly assesses the results of the internal inspection (e.g., screens the inspection report) and makes a decision whether the farmer is approved, any conditions must be imposed, or any sanctions are needed.

This approval/sanction decision must be somehow documented. In some cases the 'Approval Manager' writes the approval decision on a special section in the internal inspection report form. Sometimes it can be considered as 'approval step' to screen the report and then update the information in the farmers list and document the respective internal approval status (organic, conversion, sanctioned, etc.) there.

It is important that a clear decision is made and that this clear decision is reflected in the final farmers list submitted as results of the internal control.

Thus the ICS Coordinator takes responsibility for the correctness of the information in the farmers list; he/she must at least approve the lists. From second certification onwards the lists MUST reflect the correct internal approval status, at least 'ok', 'sanctioned', etc., or even better the exact proposed certification status such as 'conversion 1st year', 'organic', etc.

For first inspections the whole system of inspection is usually so new that the ICS does not want to make any clear decision on the status before the first external inspection and this is acceptable.

In updating years of certification, the certifier should agree with the ICS Operators on clear rules for handling conversion, so that for new farmers the ICS is able to set the correct approval status, which will also be valid for external certification. This is particularly important in case of retrospective approval of conversion period, i.e., if due to non-use of chemicals new farmers are registered straight away as 'last year conversion' or similar. IFOAM recommends a MONITORED conversion period of at least 12 months.

Approval Procedures

5.6.1 The organization must have procedures to approve or reject farmers

- Is there any approval procedure in place?
E.g., the ICS Coordinator screens all reports and if found ok signs the report and updates the information in the farmers list.
- Who takes approval/sanction decisions?
Approval Manager (may be ICS coordinator) or Approval committee?



5.6.2 & 5.6.3 From second certification onwards, the farmers lists reflect at least the internal approval status for each farmers: OK, passive, sanctioned, etc. (A) or even states the exact conversion status org. / conversion 1/ conversion 2 etc. (B)

- Conversion status: according to rules agreed with certifier



Sanction procedures

If minor or major non-conformities are identified during internal inspection or by other control mechanisms, the ICS has taken appropriate measure to correct them and/or sanction the farmer if needed.

During the ICS office audit it is therefore important for the inspector to get an overview of all sanctions imposed by the ICS (list of sanctioned farmers). Also get an overview of minor non-compliances that sometimes are NOT listed in the summary lists but only in the individual farmers inspection reports. What were the major problems identified?

The inspector has to understand the ICS's sanction system. What happens in case of non-conformities? What kind of sanction is used? How is it ensured that sanctions are effectively implemented?

How and where are sanctions documented? In the farmers list? In special 'sanction reports'? Only in sanctioned farmers list? How is it ensured that sanctioned farmers are TAKEN OUT of the approved farmers list and any buying lists?

In case products have already been bought, the farmer needs to be de-certified (e.g., 2 weeks after harvest it is found out that the farmer had used insecticide against ants during harvest), the certification body must be notified, and further measures agreed upon.

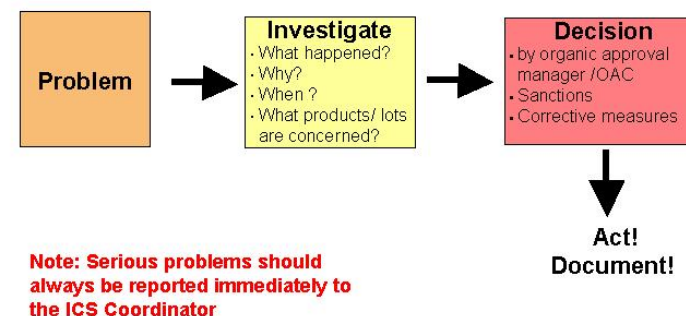
What SHOULD be done in case of non-conformities is illustrated in this slide.

If a problem is found, it should be investigated in detail: what happened and why? What areas/lots are concerned? When? Serious problems should be immediately reported to the ICS Coordinator.

Based on this information a decision is made by the approval staff. Especially in case of severe deviations and hence severe sanctions, it is much recommended to discuss the decision in a group (approval committee, but could also be simply the team of internal inspectors) to come up with an appropriate and well balanced decision and to decrease the psychological pressure on the ONE person who has to make the decision.

The decision (sanction and or corrective measures) needs to be documented.

What Should Be Done if There Are Problems?



Types of sanctions

This slide shows a sample table of possible internal sanctions. Such a table could be included in the ICS manual as a basis for making sanction decisions.

Please note that the second sanction, 'financial penalty', is not very common and it depends on the cultural situation whether it is useful & appropriate.

Examples of non-conformities and their internal sanction

This is another example of an ICS group's table of sanctions, as it could be included in their ICS manual.

It includes both the actual sanction (e.g., 'suspension of certification for 1 year') and other necessary action.

One example:

Under certification according to EU Regulation, a farmer has sprayed his/her home consumption plot, which is well separated from the organic plot, but the internal organic standard demands organic management of all crops.

As punishment the farmer is suspended internally for one year (but remains in the certification program – for the certification body the farmer is not downgraded because there was no violation of external standard). Additionally the sprayed plot is marked as non-organic or 'sprayed on date XXX' in the map and the farm file; and the farmer is given extra training and supervision in order to ensure that this problem does not occur again.

As the inspector you need to assess whether the planned and imposed sanctions are appropriate, i.e., at least as strict as the external certification body would impose them.

If the ICS is punishing much more strictly than the certification body would, this could be pointed out to the ICS, but it is the ICS's own decision how to define their minimum standards (as long as they are higher than external certification standard). If MANY farmers are punished 'too strictly' it may be good to explain the external standard requirements to the ICS, because sometimes ICS operators assume organic standards to be even much stricter on certain issues than they actually are.

Examples of really strict punishment include downgrading farmers to first year conversion because they have failed to attend the farmers meeting or expulsion of farmers if, because of a lack of awareness, they have used urea in their clearly separate maize plot (when the certified crop is coffee on clearly separate plot).

In the first example the certifier could, e.g., choose to keep this farmer on the organic farmers list because there was no deviation of standard, and simply indicate – 'suspended internally 1 year'.

Examples for Types of Sanction

Sanction	Situation when sanction applies
• Written condition	• Minor deficiencies in record keeping, weak farm management. Minor violations of the standards or regulations
• Penalty ICS will fine farmers \$5	• Repeated written condition for similar problem Not responding to conditions Major deficiencies in record keeping
• Suspension for a fixed period until the farmer takes corrective actions requested (remains certified)	• Repeated minor violations Clear violation of the Standards but not threatening the organic integrity of the product.
• Decertification of farmers --> New start of conversion period for 36 months	• Clear violation of the standards threatening the organic integrity of the product.
• Farmer banned from ICS membership either permanently or for a set time.	• Obvious fraud, Intentional obstruction of the inspection process, Refusal to respond to written request

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Discussion: Non-compliances and their sanctions

Have you come across cases in which the ICS has been much stricter in punishment than the certification body would have demanded? In the cases shown on this slide (slide 12—show only left side), what would sanction would YOU, as external inspector, propose as an appropriate sanction for the respective problem? And what would be other related actions that the ICS would have to take in this situation?

Examples of Non-compliances & Sanctions

Example Non-compliance	Example Sanction / Reaction
Farmer has sprayed his/her organic crops	farmer de-certified for 3 years (new conversion) possibly expelled from organic program check whether products already bought
Farmer has sprayed home consumption crops intercropped with organic crop	Farmer de-certified for 3 years (new conversion) possibly expelled from organic program check whether products are already bought
Farmer has sprayed home consumption garden far away from organic garden but not allowed per internal regulation	Farmer suspended as punishment for 1 yr. Sprayed plot recorded in map as conventional Additional training for farmer
Farmer has neglected his farm and has not taken any soil improvement measures	Written/oral condition to farmer additional training if repeatedly, discuss whether shall still be member
De-certified coffee has been mixed with organic coffee of fellow farmers in village	Find out which lots are "contaminated" indicate these lots as conventional
Farmer sells double his estimated harvest	Send field officer to investigate in the fields if farmer has sold products of somebody else – expel from organic program
Buying officer has bought from not certified farmers	Find where the conventional product is now, downgrade product to conventional. If already sold, inform certifier. Train buying officer (or dismiss him if fraud)

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Consequences if farmers have used prohibited inputs

If you assess the efficiency of the internal sanction procedures it is important that you yourself keep in mind all the actions that the ICS must take if organic farmers are found to have used prohibited inputs in their organic crops (or any other deviation that directly jeopardizes the organic quality of the product of this farmer).

The consequences of this deviation would be as follows:

- All fields of this farmer must undergo full conversion (IF farmer is kept in the project and not expelled). Usually ALL fields will be de-certified since in most cases it is almost impossible to handle different conversion statuses of different fields in a smallholder farm.
- Document the problem and sanction in farmers list (remove farmer from approved farmers list and put him/her with remarks in sanctioned farmers list), change purchase list (farmers list version that purchase officers use for purchase).
- Assure that farmer REMAINS sanctioned for 3 years (and is not accidentally included in the following year in the list of organic farmers).
- Check if production of this farmer has already been bought (since the prohibited application). If yes, notify certification body. Check whether the product has already been commingled with products of other farmers. If the organization has an organized lot number system, it is possible that the product has been commingled with very little other produce and is easily traceable. Without a good lot number system a much bigger lot may be affected because it is not completely clear in which parts of the big lot the de-certified product can be found.
- Explicitly inform field officers and purchase responsible of the sanction.

Motivation Exercise: What needs to be done if farmer is found to have used prohibited inputs?

What needs to be done if it is found at any time that a certain farmer has used prohibited inputs in the organic plot?

What reaction of the ICS would you like to see when assessing the efficiency of their internal sanction system?

Consequences and Necessary Measures after Detection of Farmer's Use of Prohibited Inputs

The fields of the farmer must undergo again the full conversion period

Document the sanction in the farm file, farmers list (take farmer on sanctioned list), change purchase list

Check whether the farmer has already delivered produce



Assure that the farmer remains sanctioned during the next 3 years

Check whether his produce has been commingled with other organic produce

If produce has been commingled, the certifier needs to be notified immediately and the commingled produce kept separate until further instructions.

Inform the field officer and purchase staff that no purchase of this producer is allowed during the period of sanction

Group Work: Assessment of approval & sanction procedures (1.5–2h). This exercise does not exist on CD, but a hard copy is available
 Either chose your own example or use Case Study II (spice project) for this exercise.

Form groups of 2-4 participants. Each group receives one copy of the ICS Manual with related documents about sanctions, etc.




1. Evaluate the ICS manual in general.
2. Evaluate the internal approval and sanction system:
 - Complete chapter 5.7
 - Are the applied sanctions appropriate?
 - Prepare questions for the ICS Coordinators about approval and sanctions.
 - Would the evaluation of sanctions give you any additional focus for the farm-re inspections or other parts of the ICS evaluation?

(no sample solution)

4.2 Inspection of the Internal Control System 15

Exercise: Evaluation of Approval/Sanctions
Case Study II, Spice Project ZZZ (does not exist on CD)

Basics: 800 farmers, organized by NGO, certified for 3 years







Received documents:
 Complete ICS manual, incl.

- 'Internal regulations'
- 'Internal Control System for small farmers'
- Summary farm records, sample purchase lists
- Documents on sanctions

Evaluate the approval & sanction system

- Overall impression of the ICS manual
- Clear approval system?
- Clear sanction system?
- Are sanctions documented? – is the sanctioned farmers list sufficient?
- Are sanctions appropriate (standard list of sanctions)?
 Any indication of other measures taken in cases of use of prohibited inputs?
- Questions to ask ICS Coordinator?
- Any additional info for special focus during next re-inspections?


 Training Manual on Evaluation of the Internal Control Systems

ICS Staff Qualification & Conflicts of Interest

Staff Qualification & Training

As seen, the tasks for an ICS are quite complex and demanding. Therefore the ICS must have qualified personnel. Qualification of the ICS manager and the internal inspectors is particularly critical for the functioning of the system.

The ICS staff must be sufficiently qualified. Internal inspectors have to receive at least 1 training session per year. The training should also contain some practical field inspection days. Good training includes inspectors accompanying each other on inspection and giving each other feedbacks. The training must be documented.

Qualification of inspectors is verified during farm re-inspections. The quality of their inspection is assessed, along with their knowledge of organic production, the internal organic standards, etc. Witness audits are very useful for checking on their inspection techniques.

Also it may be important to check whether the inspectors are in a position to do a thorough and critical inspection; e.g., in many countries very young inspector might find it difficult to ask an older and highly respected farmer any kind of critical questions.

Avoiding conflicts of interest

The objectivity of the ICS inspections and decisions may not be jeopardized by conflicts of interest.

A conflict of interest means that the person (e.g. the internal inspector) is not in the position to make an objective decision because he/she is personally too biased. Example: an inspector inspecting his grandfather or best friend. How will he be able to ask this person critical questions or know how to react if he/she notices anything critical? Another example of conflict of interest could be income; if purchase officers are paid per quantity bought, the risk that he/she might also buy from uncertified farmers (e.g., because the road to certified farmers was so bad that day) is definitely higher.

Therefore all measures must be taken to avoid conflicts of interest.

The ICS has to have conflict of interest declarations for all internal inspectors and approval staff. These declarations shall list all potential conflicts of interest, e.g., lists of all organic farmers in the projects with whom the inspector is related, close friends, which village he/she originated from (if this village is in project area), etc.

The ICS has to take all measures to prevent actual conflicts of interest from arising; i.e., internal inspectors are assigned internal inspections in a DIFFERENT region than their home place. Or a different inspector conducts the inspection of an uncle of the internal inspector.

If the inspector finds that there have been potential conflicts of interest (e.g., internal inspector has inspected his/her uncle), this case has to be investigated in detail and the farmer re-inspected to confirm that the conflict of interest has not resulted in biased treatment.

ICS Personnel

5.7.2 The internal inspectors are qualified for a thorough and objective inspection. Each inspector receives at least one training per year



- Qualification of inspectors can be checked during farm re-inspections, witness audits and through interviews
- Can they really do thorough inspections? (e.g they may be too young to ask elders critical question)
- Good idea for effective inspectors trainings may be accompanied inspections, on farm-training in inspection methods etc.
- Participation and content of training must be documented

Conflicts of Interests



5.7 The objectivity of the decisions made by the ICS may not be jeopardized by conflicts of interest

- ICS needs conflicts of interest declarations for inspectors & approval staff.
- Conflicts of interest must be avoided. A person may not inspect/approve his/her own farm, nor the farm of neighbors, close friends or family
- If there have been potential conflicts of interests – check that it has not resulted in unfair assessment/neglect of important facts



An inspector can not inspect his close friends or family

Separation of Inspection and Extension (Consultancy)

One particular aspect that has often been discussed in the context of ‘conflicts of interests’ is the separation of internal inspection and field advice.

It has been widely regarded a conflict of interest if the same person does both internal inspection and consultancy work (for the same farmer). This position mainly originated from the general criteria for certification bodies (separation of advice and inspection), but also from the fact that in many cases the field advisor is very close to the farmer and knows them too well to do a complete and thorough internal inspection at some point, checking all aspects of the internal organic standard. Also having two persons to visit a farm adds to the objectivity of assessment and reduces the risk for problems.

Therefore many projects have started to exchange field officers for their internal inspection work; i.e., field officers inspect the group of farmers of their colleague field officers once a year for the formal internal inspection.

However, the result of this requirement has been that in some cases the field advisory service was neglected for the sake of having a fully separated internal control. Sometimes, internal inspectors are so far from field realities that they also do not make good inspectors. Also, small projects face a real problem in having two different persons for extension and inspection.

Therefore the rule has now been changed that ‘extension and internal inspection does not need to be separated per se’.

The main point is that the internal inspection must be done in an objective way, as a clearly separate event and without conflicts of interest (i.e., the inspector and advisor cannot be too close/familiar with the farmers).

If extension and internal inspection are done by the same person for the same farmers, the external control will focus on the actual quality of the internal inspection and objectivity of the field officer.

In many cases the field extensionist may really be ‘too close’ to the farmer, i.e., too attached because of the regular contact, living in same village, etc. Or he/she might not be capable to ‘take a step back’ for the internal inspection and really do a complete and thorough check (i.e., asking all questions for which he/she presumably already knows the answer).

In other cases it may well be found that the extensionist is not close to the farmers at all and has a sufficiently ‘critical’ character to fully assess the farmer during internal inspection and even to do a much better and more thorough internal inspection than anybody else could do (e.g., because he/she is the ONLY person in the project who is really competent in organic farming and the local production situation).

The result is that there must be a more qualitative assessment of the objectivity of the internal inspection, rather than a simple rule of thumb ‘it must be separated’.

Group Discussion: Separation of inspection and extension

What is your present position on separation of extension and internal inspection? Do you require strict separation, and how? Can field extensionists do internal inspections? Or only in a different region?

And why do you think that extension and internal inspection must be separated?

What would the problem be if a competent field officer who visits the farm twice a year for ‘extension’ comes once a year to these farms (which he/she knows very well, including all problems) to do a complete internal inspection?

The following slides summarize IFOAM’s position in this matter. The new inspection protocol is based on this position.



Inspection vs. Field Advice



- Field extension service (farm advice) is an important aspect of an organic project and often field extensionists are at the same time internal inspectors.
- However, field extensionists tend to be very close to the farmers; they often live in the same village and therefore are often not “neutral” enough for the actual inspection.
- Many ICS Operators solve this problem by exchanging field officers (advisors) among project regions for internal inspections.
- However, in certain cases it can also be accepted that one person does both the field extension and the internal inspection, but, at minimum, they should be clearly separate events. This is only possible if the advisor is “distant” enough from farmers to ensure an impartial inspection.
- Informing the farmers of the standard requirements and the functioning is not considered consultancy. An internal inspection may also include some advice.

5. External Farm Re-inspections & Witness Audits

Farm inspections are a very important part of the overall ICS evaluation because all aspects that have been seen preliminarily in the ICS office can be confirmed and cross-checked with what is seen in the field.

Farm re-inspections are much more than just FARM INSPECTIONS; their main purpose is to assess the efficiency of the internal inspections and confirm the quality of the ICS documentation and staff qualification.

Farm re-inspection tours also provide important information for the overall risk assessment and allow a cross-check of the information received by the ICS with the farmer and others (e.g., neighbors, other people in the village, etc.).

A lot of information regarding the ICS and the overall project compliance can be collected during re-inspection tours.

Apart from the quite obvious check of whether the farm has effectively complied with the internal and external organic standards, other information can be collected:

- Is there demonstrated evidence that the farmer has ACTUALLY been internally inspected and did not merely fill out the internal checklist in the office (e.g., does farmer know the internal inspector, can farmer remember the inspection, is farmer's signature identical to that on the ICS documents?)?
- Has the farmer received training? Is farmer aware of his obligations as organic farmer?
- Have all critical control points on the farm been thoroughly checked by the ICS (sometimes only the first farm re-inspection shows ALL critical control points on farm level)?
- Are the findings of the internal inspector the same as those of the external inspector? That is, were the same non-conformities identified or were there issues that were detected by the external inspector that the ICS missed?
- How well have the results of the internal inspection been documented? Maybe the internal inspector is aware of all identified critical aspects, but has somehow not been able to express it adequately in the inspection report form.
- Check the qualifications of internal inspectors and field extensionists (don't forget to also ask them questions during the farm visits to get some understanding of their qualifications and understanding of the procedures).
- Do the ICS documents reflect reality?
- How are internal control procedures implemented? Similar to written procedures?

Objectives of External Farm Re-Inspections



- Assess the efficiency of the internal inspection - have they detected everything?
- Assess quality of ICS (documentation, staff qualification, etc.)
- Risk assessment
- Cross-check different information with the farmer and others



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Motivation Exercise: What can be found out during farm re-inspections?

What can you find out during farm re-inspections? What kind of information are you looking for when doing farm inspections? (→ When presenting the following slide in PowerPoint, another sub-point will appear on the screen with each mouse click.)

Information Collected during Re-Inspections

Has the farmer complied with the external and internal production standard?

Does the farmer know the inspector and confirm that he has been inspected?

Is farmer aware of his/her obligations and trained in organic farming?

Are the findings of the inspector the same as findings of the internal inspector?

Are all critical issues thoroughly checked by ICS?

How well have the results of the internal control been documented?

Qualification of internal inspectors & extensionists

Cross-check with purchase data

Does the documentation (maps, field data, yield estimates) reflect reality?

Are the defined ICS procedures really implemented (e.g., thorough & complete annual inspection with interview)?

Assessment of other control mechanisms



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Selection of Farmers for Re-inspection

Since we only inspect a few farms in the group externally, it is very important that we chose the RIGHT farmers for re-inspection in order to be able to assess the ICS with all potential critical control points.

When selecting farmers for re-inspection the following information is relevant to the selection:

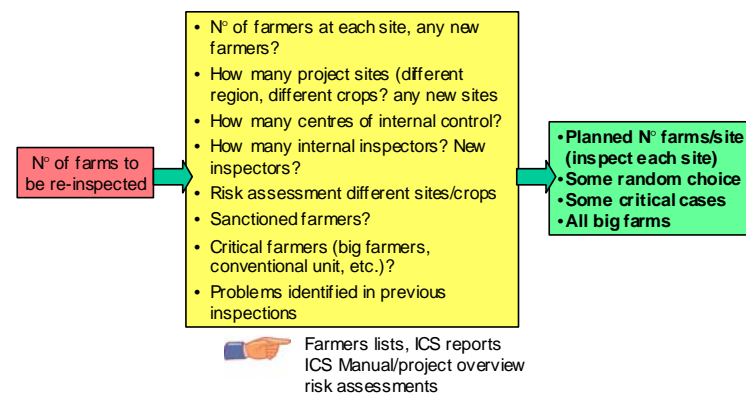
- Total number of farmers at each project site? Any new farmers or even new project sites?
→ The basic approach would be to plan the number of re-inspections per project site proportionally to number of farmers at each site; i.e., site with more farmers → more re-inspections.
→ Any new projects sites will be particularly interesting to inspect.
- Are there distinctively different project sites, or possible sub-groups within the ONE project site? For example, all farmers are located in the same region with same ICS center and scattered over only a few villages. Maybe there are still sub-groups of these villages, because, for example, all villages in the higher altitude have only one plot and grow different intercrops, while the farmers in lower altitudes tend to have conventional maize fields.
→ Try to cover all potentially different project sites/sub-sites. Not all project villages must necessarily be re-inspected; focus instead on GROUPS of similar villages and ensure that over 2-3 years, all project villages are re-inspected.
- Are there different centers of internal inspections, e.g., 2 field ICS offices with different internal inspectors for the whole group? → Try to cover all centers of internal inspection.
- Are there any new internal inspectors? Any regions where there seem to be too few internal inspectors? → Try to do some re-inspection of those farmers who have been inspected by the new inspector.
- In high-risk regions/villages, more farm re-inspections will give a better picture of potentially problematic/critical cases.
- Check on sanctions. Are there any regions with high numbers of sanctioned farmers? What was the reason for sanctions? Could the problem also be of concern to other regions? → Re-inspect farmers close to sanctioned farmers or similar to the sanctioned farmers (size, intercrops, etc.).
- Try to always select at least some potentially critical farmers (e.g., non-organic fields close by, etc.) at each site. Also include at least 1-2 rather remote farms.
- All big farms must be re-inspected (plan more time, depending on size and complexity).
- Check previous inspection reports and risk assessments on specific problems identified and try to select farmers accordingly to check whether these aspects are still problems. Risk assessment includes the consideration of whether any major external facts might have changed the overall risk situation (e.g., very active new pesticide companies in the area, one intercropped high risk crop suddenly has a very high market price) → farmers might be tempted to use chemicals which they did not in past year → plan inspections accordingly.
- In reality a few farmers will always be chosen randomly and others chosen for practical reasons.

Motivation Exercise: Selection of farmers for re-inspection

Let's say you have determined the minimum number of farms to be re-inspected, seen a project overview, and started your office audit. What factors would you consider in order to select which farms you will re-inspect?

(If presenting in PowerPoint the middle and right box will only appear after clicking with the mouse or RETURN-key.)

How to Select Farmers for Re-inspection?



Important Aspects of Planning Re-Inspections

Since the overall aim of the re-inspection tours is a thorough assessment of the ICS, sufficient time is needed for the inspections and for obtaining information from various sources during the re-inspection tour. As a general rule it is recommended not to plan for more than 5-7 inspections per day; if farmers are far apart even fewer may be possible.

It is crucial that the “right” farmers are selected to uncover all potentially critical aspects with minimal farm re-inspections, so the selection of farmers should be considered seriously.

In the course of the inspection, the inspector might suddenly become aware of previously undiscovered critical issues (which perhaps were no problem in previous years but are a problem now), and may need to revise the re-inspection plan. If any major non-compliances were missed by the ICS, additional time may also be needed to further investigate the issue.

Re-inspection Procedures

Re-inspection procedures of external inspections include basically the following parts. Each step will be discussed in more detail.

‘Normal farm inspection’:

- Inspect the full farm and interview the farmer in order to assess compliance with the external certification standard. The farm’s documents (=ICS documentation) are also checked.

Assessment of the Internal Control

- Cross-check the farm with ICS documentation, cross-check findings with ICS findings
- Try to understand the real ICS procedures (how often does the extensionist really visit the farm, what is effectively checked during the internal inspection, what is perhaps checked during extension visits instead of being checked during internal inspection, etc.
- Do a few witness audits (accompany the internal inspector during an internal inspection).

→ Assess the quality of the internal inspection

Other collection of information for overall evaluation & risk assessment

In the course of a re-inspection tour, various other useful pieces of information can be collected to complete the overall assessment of the ICS performance and the risk assessment:

- Visit neighbors, input stores, talk to local authorities of governmental extension officers, etc.

Important Aspects in Planning Re-Inspections



Since the aim is mainly to assess the ICS, you need sufficient time for the inspection and related other sourcing of information ⇒ don’t plan to do more than 5-7 inspections/day (even if close to each other)



It is crucial that you chose the „right“ farmers, so you need to plan carefully and try to find all potentially critical aspects beforehand. Then you can be more focussed in the inspections



Possibly you need to revise your risk assessment and plans in the course of the inspection, so you also need to be a bit flexible.



After having inspected only very few farmers yourself you need to feel confident that 100% of all farmers comply with the regulations...



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Re-Inspection Procedures



“Normal” Farm Inspection:

- Visit farm, storage, processing
- Interview the farmer
- Check farmer’s documentation



Assessment of the Internal Control

- Cross-check with internal documentation
- Cross-check with results of the internal inspection
- Try to understand the “real” ICS procedures, possibly with witness audit(s)

⇒ Was the internal inspection complete & thorough ?



Other sources of information for evaluation of the ICS:

- neighbors, marketplace, village leaders, etc.
- agrochemical stores



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Re-Inspection of farm activities

The core farm inspection covers all steps that would also be checked for bigger farms (and which should all have been checked during internal inspections).

- Visit the organic fields (if not all can be visited – spot check different fields each year). Don't just linger around the house but try to see a substantial portion of the farm and assess the actual cultivation measures; keep your eyes open for any suspicious signs (e.g., very uniform weeds in certain places might be indication of herbicide use, etc.).
- Specifically check the farm boundaries for major risk problems.
- Briefly check conventional fields, too, particularly if close by, but also spot check distant plots to confirm that there is no parallel production.
- Interview the farmer in detail on his/her farming practices, changes in area or management.
- Check internal farm documentation and compare it with results of your own investigation. Example: you find that the farmer has recently used lime – is the lime registered in the farm diary? Or in the internal inspection report?
- Inspect animal husbandry.
- Enquire about post-harvest handling and check all equipment, storage areas, etc. Any contamination risks by use of contaminated bags, unclean equipment, harvest protection measures, e.g., against ants? Any commingling risk because of process of, e.g., drying the products together with brother, etc.?
- Check storage area. Pest control measures?
- Check garbage heaps, toilet, tool rooms, etc (any place where any traces of containers of prohibited inputs may show up).
- Fill in the farm re-inspection checklist to document your results.

ICS Evaluation during Re-inspections

As mentioned previously, an equally important part of an ICS inspection is the evaluation of the ICS system. For that purpose the following components should be considered during re-inspection visits:

- Take the internal inspector and preferably also the field extensionist with you during inspections. Ask them specific questions about the farm – but don't allow them to influence the answers that the farmer has to give you.
- Find out how familiar they are with the farm, with the internal organic standard, and the ICS Manual in general? Ask them, e.g., to explain in their own words what they do during an internal inspection or an extension visit, how often they visit the farms, etc.
- Try to find out whether they could have potential conflicts of interest by asking, e.g., about their home village, whether they have any relatives in the area, etc.
- Has the farmer been trained in organic farming? Can the farmer confirm that he receives extension visits? Is farmer competent in organic farming methods?

Motivation exercise: What is checked during farm inspection?

What are the steps in a normal smallholder farm inspection? What do you need to check in order to confirm the farmer's compliance with the organic standard?

5. External Farm Re -Inspections & Witness audits

6

Farm Re-Inspection



- Brief check on animal husbandry
- Check of harvest and postharvest activities as well as storage
- Check of input storage, sprayers, garbage pits around the house etc.
- Fill in sample farm inspection report form

- Visit of organic fields (selection of fields)
- Visit of conventional fields (spot checks), check buffer zones
- Interview with the farmer
- Check of the internal farm documentation in the farm file
- Check of farm boundaries



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5. External Farm Re-Inspections & Witness audits

7

ICS Evaluation during Re-Inspections



- Take the internal inspector and preferably also the extensionist with you on at least some of your re-inspections
- Find out how much they know about the farm's activities, how familiar they are with the internal standard.
- Cross-check your own findings with the internal documentation, incl. farmers list, with the internal checklist and with the oral info from internal inspectors. Also cross-check with, e.g., buying lists of ICS.
- Has the farmer been trained and knowledgeable about organic production? Does he/she know the requirements?

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Witness Audits

Witness audits may be another useful tool for assessing the quality of the internal inspection.

A witness audit means that the external inspector accompanies an internal inspector during a complete internal inspection, i.e., during preparation, the actual farm inspection, and when the inspector fills in the report and possibly reports back to the office.

Witness audits can give quite a good overall impression of the ICS and the actual internal inspection procedures.

They can provide information such as

- Is there really an internal inspection (inspector & farmer are familiar with the situation).
- How familiar is the inspector with the forms? Does he/she understand them and seems to have used them many times?
- How complete and thorough are the inspections, does the inspector have an efficient inspection technique and follow up with further questions on potentially critical aspects?
- How competent is the internal inspector (and/or field extensionist) in organic production and the internal organic standard requirements?
- If the inspector has written weak internal inspection reports → are inspections also weak and haphazard or does he/she merely have problems with reporting?

Witness Audits

The external inspector accompanies an internal inspector and witnesses a complete internal inspection:

- Preparation
- Complete farm inspection with field visit and interview
- Filling in the report, reporting results to the office)



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Motivation exercise: What can we find out in witness audits?

What can be found out in witness audits?

(in Powerpoint different points show only after click)

What Can We Find Out in Witness Audits?



How familiar and confident is inspector with documentation?

How thorough are the internal inspections?

Knowledge of organic requirements

Do the inspections cover all aspects?



Was an inspector e.g. only weak in reporting, but thorough in his inspection?

Is there really an internal inspection? Are inspectors and farmers familiar with the situation?

Knowledge about organic farming methods and problems of specific crops

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How many witness audits are needed?

Witness audits are not compulsory for ICS evaluation but they are highly recommended. It is recommended that the inspector do a few witness audits and assess how useful these audits are for the overall assessment. It could be that internal inspectors are too intimidated by the witness situation so the value is limited.

It is recommended that weak internal inspectors, in particular, be accompanied; i.e., those who have written incomplete or poor reports, or those who have inspected farms where the external inspector had already found problems. It might also be a good idea to accompany new inspectors.

Are the witness audits useful and informational? → You could do, e.g., even one witness audit per internal inspector or take it in turns accompanying all internal inspectors in a 2-3 years cycle. This obviously also depends on the inspection assignment received from the certification office.

Witness audits could in principle count as farm re-inspections for meeting the minimum farm re-inspection rate. However they could be seen instead as additional assessments with regard to ICS evaluation and risk assessment and hence be done IN ADDITION to the minimum number for farm re-inspections. This also depends on the risk situation.

Other sources of information during a re-inspection tour

During the course of a re-inspection tour, many other sources of information can provide important insight and confirmation of the situation for both evaluation of ICS and for risk assessment and identification of critical control points.

Such potentially interesting sources of information could be for example:

- Neighbors (both those who are part of the project and not part of the project)
- Other farmers in the area (random farmers met along the street, etc.)
- Village chemical store
- Local village farmer shop
- Governmental agriculture extension services
- NGOs etc.

From these sources a broader picture can be obtained about

- typical farming practices in the area and potential risk crops.
- social control mechanisms; do the organic farmers of the project know each other and know what is happening on each other's farms?
- are the organic farmers known in the village as organic farmers? any political/social pressure on them (envy, not in line with governmental policy, etc.)?

How Many Witness Audits Are Needed?



It is highly recommended to do at least a few witness audits with internal inspectors to assess the quality of their inspection work.

When deciding on how many witness audits should be conducted, the following aspects shall be considered



- accompany "weaker" inspectors (poor reports, no sanctions although other inspectors found major deviations, etc.),
- focus on areas/crops with rather high risks, e.g. with conventional crops,
- are the witness audits useful and give additional information on the ICS? If yes, do for example one audit per internal inspector in the first year and a few per year the following years,
- Witness audits could count as external sample inspection (for inspection rate), but certifiers may choose to do witness audits in addition to sample farm inspections.



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Other Sources of Information during a Re-Inspection Tour (same for Risk Assessment)



Neighbors (not part of project)

- informal information about the organic farmers. Do they know/suspect that not all is as organic as it seems?
- How do they cultivate the same crops (incl. intercrops) - what inputs do they use?



Village Agrochemical store

- What do farmers commonly use on which crops (critical crops, information what farmers might be tempted to use)
- Assessment how many % of all farmers buy agrochemicals (for specific crops)
- Does the shopkeeper know some organic farmers as customers?



Local village soda shop

- Possibly some informal information about the project or farmers from complete outsiders



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Sample Inspection Trip (min. 1 day)

Integral part of an ICS inspection or evaluation training should be at least a 1-day field inspection to an ICS operator.

The sample inspection trip could include the following parts:

- *screening of ICS Manual as preparation, collection of critical control points to follow up on during the sample inspection*

On site, participants are split into 3 groups.

- *One group visits first the ICS Coordinator with a systematic check of farm files and then visits two farms.*
- *The other group starts with 1 farm inspection, then meets the ICS Coordinator, then does one more farm inspection.*
- *The 3rd group does 2 farm inspections and then meets the ICS Coordinator for further questions.*

The visit should be well prepared so that, e.g., copies of farm files are prepared beforehand to take along after the inspection for further evaluation the next day. The trainer should have done a preliminary test inspection visit and should be familiar with the ICS and all critical control points of this group. The ICS operator must be willing and interested in participating in this kind of exercise because it may require quite some effort.

Special aspects of farm re-inspection:

- *Visit a farm preliminary chosen by the trainer (could be for example a rather tricky farmer who might have interesting aspects to find out about).*
- *The full farm file for inspected farmer as well as farmers list should be available, so that during the farm re-inspection visit the quality of the documentation system can also be counterchecked.*
- *Inspectors should be motivated to really use the farm visit for ICS evaluation!*
- *Each inspector should complete a farm re-inspection report to familiarize him/herself with the form.*

ICS Office visit:

- *Ask questions of the ICS Coordinator about internal inspection procedures, approval and sanction procedures, and any critical/unclear points*
- *Screen farm files and select farmers for re-inspection (even if in fact you will inspect or have inspected other farmers).*

- *Inexperienced inspectors might need preparation in order to have an idea what to ask the ICS Coordinator. A preparation break for the group with help of ICS compliance criteria document and a collection of possible questions will help.*

After the inspection, the participants could be asked to complete the full ICS report (as far as possible, since some points certainly could not be checked completely in one day!!) or the results are simply discussed in the group, no report format completed.

6. Inspection of Product Flow

The responsibility of the ICS goes further than the mere inspection of farm production activities. The ICS operator also supervises the purchase of organic produce from the farmer and subsequent handling steps (as long as the product is under responsibility of the ICS operator).

A typical product flow of a smallholder group is illustrated in this slide.

On the single farms, some simple farm processing is usually done, which is checked during internal (and external) farm inspections.

Then the organic products are brought by the farmers in bags to the purchase center. The purchase center does some grading, consolidates all products collected in a certain week, and sends this lot to a central warehouse.

There the produce is stored for a while until a sufficient quantity is accumulated for running the processing. The product is sent to a contracted processing unit (could also be farmer's own processing unit) and, later, is received back in the warehouse in bags ready for export.

Just before export, the product is labeled with export lot numbers and packed in the warehouse in the shipment container and then being exported.

Buying Procedures

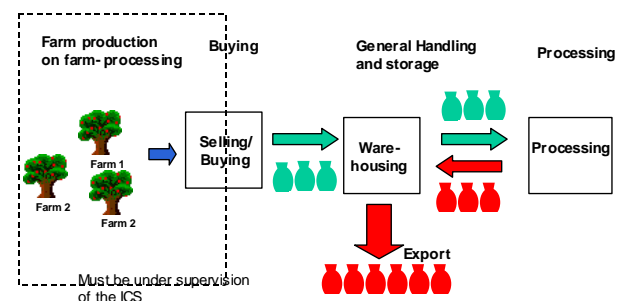
The organic status of the farmer must be checked during the buying process. Only the produce of a certified organic farmer is considered 'organic'.

Verification of the organic status has to be done on basis of the certified farmers list, i.e. on basis of a list of certified farmers confirmed by the certification body. No product may be used from, e.g., new farmers who have been internally inspected but whose certification status has not yet been confirmed by the certification body. It is also unacceptable that the purchase officer buys from a farmer just because he/she 'knows that this is an organic farmer'.

Some operators choose to prepare a separate buying list based on the certified farmers list, up to date yield estimates, and all sanction decisions. This may be a good system. Otherwise the purchase officers may receive a copy of the complete certified farmers list plus update lists of sanctioned farmers to check the status.

The delivered quantity must be compared with the estimated yields. In case of doubts the product must be kept separate until clarification. This implies that if each farmer delivers several times, the delivered quantities are summed up to check whether the estimate has been exceeded.

Inspection of Buying/Selling and Handling



Motivation exercise: Buying organic produce

What are correct buying procedures for organic produce? How would you expect the ICS Operator to organize the buying process in order to be in compliance with the organic standards?

What would you check if you inspected a buying center?

Check during Buying



7.1.1 The organic status is checked at delivery/purchase. Only the product of approved organic farmers is considered organic.

7.1.2 The verification is done on basis of certified farmers list.

- What proof of organic status do purchase officers have at hand?
- How error-proof is the system?
- Considering the overall system - is there sufficient evidence that the delivered product originates from certified farmers only



7.1.4 The amount of product supplied is compared with estimated yield. In case of doubt, product is kept separate until clarification by ICS Manager.

- Procedures and/or forms for this.
- Are purchase officers aware of this duty?

Buying Documentation

The buying process must be well documented in order to allow a full follow up on the organic product flow. The ICS operator therefore has to ensure that buying documentation is kept that includes at least:

- date of purchase
- name & code of farmer
- delivered quantity
- products (if more than one)
- organic quality (on top of list or for each delivery in case different qualities are bought)

The farmer has to receive a receipt that states the delivered quantity. These receipts can be counterchecked during farm inspections in order to confirm that the ICS Operator is not faking the buying records (and buying from uncertified farms instead).

Critical control points buying procedures

The buying process is a very critical moment; in fact, mistakes or fraud during buying is one of the most common major non-conformities encountered in ICS inspections.

Problems may arise from mistakes of personnel, attempted fraud of single people, and also from more organized kind of 'mistakes', like buying produce from conversion farmers and selling it as organic because there is no more organic produce left and buyers are asking for more.

So buying inspections must focus on clear procedures that prevent accidental mistakes, commingling, etc., and must also carefully check the overall system for consistency and potential 'holes' where cheating might be too tempting.

So it is important to check the following aspects:

- Are buying personnel well trained and aware of procedures? Would the personnel have any major incentives to cheat (e.g., because paid per quantity purchased)?
- Are handling procedures standardized? Are the handling procedures realistic in everyday buying situations, or will they also work in slightly exceptional or stressful situations, if, e.g., *one day only few farmers deliver produce and the next day so many farmers deliver that storage capacity becomes scarce and the non-organic storage room is also used?*
- Is there no risk (or only very low risk) of commingling during intermediate stages?
- Calculate product flow for several lots: e.g., compare the quantities bought with transport papers for this lot with documents of receipt for that lot in the central warehouse, etc.

Buying Documentation

- Date
- Farmer's name & code number
- Quantity
- Organic quality indicated
- Product indicated (if different products)
- Farmer receives a receipt

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Critical Control Points Buying Procedures



- Are buying personnel aware of the organic handling rules? Would buying personnel have major incentives to cheat?
- Are there standardized buying and handling procedures? Are these procedures realistic in a stressful day-to-day buying situation?
- Any risk of commingling during buying and intermediate storage (all steps must be known)?
- What "exceptional situations" could occur, and how would personnel deal with such situations?
- Calculate product flow for several lots. Especially check any critical periods, e.g., with high demand – low production?

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Group work or discussion: Risks in buying procedures

Identify major potential risks and problems in buying, and for each potential risk try to work out how you could check on this risk (also to confirm that it is not a problem).

a. Some examples of risk from farmers trying to cheat

- Farmers forget their ID card and the buyer doesn't recognize them. Farmer quotes name of an organic farmer but is not registered himself.
- Farmer delivers much more than estimated by internal control – is the farmer selling his neighbors' crops?

b. Risks from incorrect behavior of buying personnel. Examples:

- If buying officers are paid by quantity delivered, they could be tempted to buy from unregistered farmers to bring in more produce.
- Roads to registered farmers may be in a very bad condition, so they may collect products from closer (uncertified) farmers or from the market instead.
- Farmers could sell goods from uncertified farmers for normal price and keep the organic premium price for his own profit.
- Buying officers buy from farmers they know (and who were certified) but who are no longer certified.
- A farmer's product quality is poor (product has been sitting in bag too long, product dirty, too many insect pests, etc.) and buyer might 'need' to buy on local market in order to deliver the agreed quantities.

c. Risks if the ICS Operator cheats systematically:

- ICS registers several 'umbrella farms' and documents them. A certain amount of produce originates from that farm, all documentation is perfect, and delivered quantities are less than estimated, but in reality the farmer buys the products on the market and register them as products of his/her farm.

Each group presents their results. Collect a list of important critical control points and how you could find out about such problems.

Handling Requirements for Organic Produce

For all steps of handling of organic produce (during buying, transport, processing), the same basic organic handling requirements must be ensured.

This aspect is no longer ICS-specific; it is the same handling requirements for ALL organic produce. So the requirements are only briefly summarized in this course. ICS inspectors will always need to be trained in handling and processing inspections, but this should be a different training curriculum.

The most important general handling requirements are:

- Separation of qualities (organic, conversion, non-organic) at all stages
- Labeling of the organic produce at all stages (and with correct status)
- If possible: introduction of lot number system for improved traceability
- Incoming as well as outgoing products must be documented (including original receipts, delivery notes, etc.)
- No contamination of the organic products (facility pest management, fumigation, etc.)
- No irradiation of the organic products
- Warehouses should usually have separate sections for organic produce and must be inspected

Organic Processing

In addition there are specific requirements for organic processing.

It is important to realize that there is usually organic processing both on the farm level and in central processing units. Also any kind of re-packing is considered processing and must be inspected.

Processing on the farm level is inspected by the ICS during internal inspections and also checked during farm re-inspections.

However, all central processing units are subject to full external inspection (as any other processing unit).

General Handling Requirements of Organic Products

- Separation of qualities (organic, conversion, conventional) at all stages
- Labeling as “organic” at all stages
- Lot number system if possible – traceability!
- Incoming as well as outgoing goods need to be carefully documented.
- No contamination (e.g., no fumigation)
- No irradiation
- Only permitted facility pest management
- Warehouses usually need to be inspected (if labelling or repacking takes place, warehouses have to be inspected as processors!)



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Inspection of Organic Processing



- Post-harvest processing at the farm level is usually inspected by the ICS and re-inspected in course of the ICS farm re-inspections
- All central processing units need to be inspected and certified (just as any organic processor)

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These slides show a few examples of

- 1) processing on farm level, as covered by the ICS, and
- 2) processing at central processing units

It is however important to realize that exactly the same requirements are applicable both for farm processing and for central processing units!

Post-Harvest Processing on the Farm

- Drying
- Peeling/de-shelling
- Cutting
- De-pulping (coffee)



Fruit drying in Turkey



Coffee de-pulping in Tanzania



Drying and selection of coffee in Bolivia



Tea processing at farmers place in China

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Central Processing Units

At central processing site and/or contracted Processor

- drying
- sorting/grading
- blending and mixing
- grinding/cutting
- de-hulling (e.g. dry processing coffee)
- multi-ingredient processing (e.g. frying banana chips in oil)
- packaging



Grading and sorting bananas Philippines



Frying of bananas in oil



Packaging potato starch China

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Requirements for organic processing

Organic processing requirements differ considerably among different standards, and interpretation may also differ among different certification bodies.

This slide shows only a very simplified summary of rules for organic processing as typically relevant in rather uncomplicated processing operations in developing countries.

Separation & identification

Separation of organic grades (organic, conversion, and conventional) during all stages of product flow.

- Separation during processing, e.g., by allocation of special days for the organic processing, separate processing workshops, supervision during organic processing.
- Preventing possible contamination through cleaning of machines before organic processing, using only clean bags for the organic produce.
- Separation during storage: separate rooms or separate areas with clear 'organic' signs.
- Identification of products as organic at all stages; products should always be labeled as 'organic'.

Ingredients & processing aids

All agricultural ingredients must be certified organic (certain exceptions depending on standard).

Examples:

- Organic banana chips: bananas, sugar, and palm oil must be certified organic.
- Spice blends: all spices used (even small quantities) must be organic.
- Natural dye (plant extract) for nicer color of shea butter must be certified organic.

All non-agricultural ingredients or processing aids used (apart from salt and water) must be explicitly permitted for organic products by the applicable organic standard. This concerns all processing aids that are in direct contact with the organic product.

- Additives to washing water, e.g., citric acid (allowed).
- Color preservatives, e.g., sulfur for dried fruits (prohibited in organic).
- Anti-coagulation agents, e.g., calcium chloride (allowed).
- Preservatives, e.g., flushing packages with nitrogen gas (permitted)

Each organic standard has a list of permitted non-agricultural ingredients and processing aids in the appendix.

Documentation

Certification status of ingredients used and all processing steps (from receipt of organic raw products to the final product) must be duly documented (certificates of incoming raw ingredients, processing diary, warehouse record).

It is highly recommended to introduce a lot processing system and to organize all documentation by lot. Many businesses have product flow systems and procedures (ISO and HACCP) that can easily be adapted to incorporate the organic requirements. Documents should be designed to meet all requirements (not separate documentation systems for different standards)

Important Requirements for Organic Processing



Separation & identification

- separation during processing
- separation during storage & transport
- labeling as "organic" at all stages
- lot number system if possible



Organic ingredients & processing aids

- only organic ingredients
- only permitted processing aids



Documentation

- processing records
- warehouse records
- inventory records

How can separation be guaranteed?

Separation between certified organic, organic in conversion (if applicable), and uncertified products is guaranteed by having the required procedures and control systems in place and staff members trained to work with these procedures. Regular monitoring and inspection (internal and external) of these systems provides a means of verifying that separation is being maintained.

All products must be accounted for

The ICS documentation trail must reconcile all products brought in with all products that go out, including waste and processed product. This reconciliation is used to provide evidence that no product unaccounted for has entered the system. Tracking products from the source through the system also provides a means of tracing products on a batch or lot basis. Should there be complaints about a product, the system should be able to trace the problem to the contributing suppliers.

The most effective way of guaranteeing separation is for the processor/trader to handle only certified organic products. In this way, all aspects of the operation are certified as organic and there are no uncertified products or activities within the operator's system.

The systems and facilities of processors and traders who handle both certified organic and uncertified products can also be certified organic once they are able to guarantee separation. They are required to clearly track the product flow, have protocols for cleaning processing machinery or have designated machinery and transport for organic use only, and designate storage areas strictly for organic products. The certified organic product must be stored and transported in easily distinguishable containers that are used only for organic products. Documentation must accompany the product at each step as it moves through the system.

Separation is guaranteed by having a clearly defined system and staff trained in their responsibilities for handling certified organic products.

How to ensure separation during processing?

Examples how separation of organic and non-organic products can be achieved:

- Only handle organic goods.
- Separate production lines (e.g. processing machinery).
- Process organic goods at separate times e.g. only every Monday morning when all machines are clean.
- All processing is strictly batch-wise.
- Well trained staff.
- Continuous supervision during organic processing.



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Exercise: Verification of product flow (1h)

Each participant (or pair) receives Case Study III or another set of buying and storage documentation records that can be counterchecked against each other.

- The purchase and product flow of pepper is checked (cross-check between buying, stock registers, and the certified farmers list)
- The processing and storage of cinnamon is checked

→ Any inconsistencies in the product flow?

→ What is your overall evaluation of the documentation?

7. Reporting, Evaluation and Certification

Reporting

At the final inspection, the inspector summarizes the overall results in the ICS inspection report. The report form is best used continuously during the inspection, but certainly needs to be systematically completed at the end, before the exit discussion with the ICS Coordinator. Enough time should be planned for reporting, since it often happens that the inspector finds that a certain aspect has not yet been covered and needs to ask a few extra questions or check a few extra documents.

Normally the report form is filled out on paper. Then a summary table of all noncompliances and proposed corrective measures, as well as the recommendation for certification, is completed. The findings are discussed with the ICS Coordinator, who countersigns the report. A copy of the report is left with the operator.

If required, the inspector also completes the same report on the computer in order to have an electronic version, and because many more details and descriptions can be included on the computer in order to give a complete picture of the evaluation of the ICS operator.

How to use the report format

When completing the report form during the inspection, the descriptive parts are only briefly checked according to whether the information is available in ICS manual or other documents, but not necessarily completed in detail.

However all compliance criteria have to be checked carefully. Each criterion should be checked OK → fully met, PF= PARLY FULFILLED, NO=NOT FULFILLED, or N/A = not applicable

OK	Compliance criteria is fully met (in all listed details). Even if a certain issue is not a problem, the criteria should be ticked as OK (not as Not Applicable). E.g., there is no contamination of products → OK (not N/A.)
PF	A compliance criterion is met in principle, but a few details have not yet been fulfilled. With a minor correction, full compliance can be ensured. → COMMENTS & CONDITIONS <i>E.g., there is a farmers list, but one required piece of information in the list is missing but registered in basic data form. Or: a procedure is planned and communicated to all staff, but is not yet written.</i>
NO	Requirement is not fulfilled → COMMENTS AND CONDITIONS
N/A	Only if really not applicable, not if it is simply no problem (OK). In principle all questions shall be answer with OK/PF/NF; N/A only should be ticked if the question really is not relevant because the described issue is not found in the project. If the N/A field is grey, the question cannot be answered as N.A. <i>Example: all questions regarding partial conversion are not applicable if the full farm is organic BUT: the question "there is no contamination" must be answered ("OK") and not "N/A".</i>

Reporting

INSPECTION REPORT
SMALLHOLDER GROWERS GROUP WITH ICS
Report N°: _____

1	Project	2
2	Inspection Details	2
2.1	Details on Inspection	2
2.2	Overview on Inspection	2
3	Project Description	3
3.1	Short History and Background of Project	3
3.2	Activities of the Project	3
3.3	Basic Information about Production Area	3
3.4	Typical Farming Systems of the registered growers	3
4	Assessing the project	4
4.1	Risk Assessment	4
4.2	Documentation of Inspection Procedures	4
4.3	The Internal Control System	4
5.1	Structure and Organization of ICS	4
5.2	ICS Manual	4
5.3	Internal Organic Standard	4
5.4	ICS Documentation	4
5.5	Internal Inspection	4
5.6	Training of Farmers and Farmer's knowledge of Organic Production	4
5.7	Internal Approval of Inspections	4
5.8	ICS Personnel & Qualities of Inspectors	4
6	Farm Production	6
6.1	Farm Size and Farm Conversion	6
6.2	Conversion Period	6
6.3	Overall production System	6
6.4	Fertilization	6
6.5	Pest and Disease Management	6
6.6	Soil and Fertility Management	6
6.7	Contaminants	6
6.8	Post Harvest Treatment (farm level)	6
7	Harvest, Processing and Handling	7
7.1	Storage and Handling	7
7.2	Processing Control Processing Chain	7
8	Conclusion	8
8.1	Overall Evaluation of the ICS	8
8.2	Compliance with previous conditions	8
8.3	Proposed Corrective Measures	8
8.4	Certification Summary	8
9	Annexes	9

1 Project	
Inspector's Personal Details (Name)	Inspector's Surname
Inspector's Personal Address	Inspector's Personal Address (Village/Town/Country)
Inspector's Title	ICS Project Manager
Inspector's Email	

- The overall findings of the ICS inspection are summarised during the inspection in the inspection report form.
- Usually this means that the report format is roughly completed on paper (mainly compliance check, few keywords for the descriptive part); the table non-conformities/corrective measures is completed.
- The findings are discussed with the ICS manager, who then countersigns the report.
- If needed, the same format is used after the inspection to prepare an electronic report with more details/descriptions as basis for certification.



How to Use the Report Format



Descriptive parts will be mainly completed after inspection (also based on information in ICS manual). Parts are narrative (text), part is a selection of description to tick ('x').



Each Compliance Criterion is checked whether it is

- OK = criterion fully met
- PF = PARLY FULFILLED; criterion in met in principle but minor corrections are needed
- NO = NOT FULFILLED
- N.A.= NOT APPLICABLE (if box is grey – no 'not applicable')



For any case of PARTLY FULFILLED or NOT FULFILLED details must be given below the table, with respective number of the criterion.



Example of how to use the report form

This slide shows an example of how the ICS report form could be completed.

Under the table with the compliance criteria the inspector has given a general comment (about the ICS documentation system in general) and then comments for all PARTLY FULFILLED aspects. All comments start with the reference numbers of the respective criteria.

Remark for the trainer: A full sample ICS report can be found in the appendix to this training manual. The part on the slide is chapter 5.4 (ICS Documentation). If considered useful for the training, the whole chapter could be discussed with the participants in detail.

Checking the farmers lists

In addition to the actual reporting, the inspector also has to check the farmers lists received by the ICS operator. This task can be quite time consuming for large organizations, but it is very important that the lists are correct.

The following aspects have to be checked in order to confirm/approve the farmers list:

- Does the list contain all necessary details for certification?
- Date of list (is it up to date?). Is the list you received really the most up to date one? (Sometimes organizations have many different versions without dates.)
- Are the lists complete? That is, do the lists contain all farmers proposed for certification (not more OR less)?
Example: ICS operator has told inspector that they have 950 farmers but there are only 820 on the list.
- Cross-check with other ICS documents, such as 'basic farm data form', inspection reports, etc. (in most cases already done during inspection).
- Cross-check with previous certified farmers list. This is very important!
 - Spot check whether they are the same farmers as the previous year
 - Change in total numbers? Number of farmers this year SHOULD BE: number of farmers last year + new farmers – sanctioned/resigning farmers
 - Have new farmers been registered in correct conversion status?
 - Has ICS made changes in conversion status correctly (e.g. last year's conversion farmers are now organic)?
- Set/confirm the conversion status for each farmer. Usually there will be a separate column with the certification status as confirmed by certifier. In many cases this will be directly the column with "internal approval result" as received from the ICS Operator. In case of certification according to different standards (e.g. EU & NOP), it is recommended that there be a certification column for each standard (if not identical) in the SAME farmers list.

Example: How To Use The Report Form

Brief Description Documentation system

So far only 2 sets of registration forms (2 versions of same form). Documents are kept in a folder at ICS coordinators home, there is no ICS office. Information is not organised per farmer but rather per document.

Evaluation

	Compliance Criteria	Cat.	OK	PF	NF	N.A
10.1	For each farmer to be certified there is a written commitment declaration between the ICS and the farmer. The declaration must contain an obligation to fulfil the organic standard	A		x		
10.2	The agreement/contract (or enclosed documents) describes the applicable production standards and allows the inspector access to the farm. The consequences (sanctions) for violations must be clear.	B	X			
10.3	For each farmer to be certified a basic data form (farm entrance form, basic questionnaire) is available. The date of last application of unallowed inputs is recorded for every plot.	A-B		X		
10.4	The basic data form describes at least the total area under management of the farmer (incl. conventional fields) and lists the organic crops with their respective area (or e.g. app. Number of trees in case of mixed cropping).	B		X		

General: Various existing documents could not be checked during inspection because they are in the ICS Coordinator's private home. For next inspection, ALL relevant ICS documents must be presented to the inspector.

10.1 & 10.2: There is a very simple commitment declaration ("I confirm that I understand the rules for organic production.") included in the farm entrance form. The actual contract that outlines in writing the organic production rules will be signed only at the end of the conversion period. If this is to be accepted, the commitment declaration in the farm entrance form needs to be improved and translated to Kiswahili.

10.3: In the farm entrance form there is no indication of last prohibited inputs for the "other crops". Also the table field history for "other crops" has been used incorrectly as importance grading of different crops (e.g., 01-crop = maize, because it is the most important crop for farmer). There is no field history for the pineapple fields, which would have been better than only the indication "last use of prohibited inputs".



Training Manual on the Evaluation of Internal Control Systems

Checking Farmers Lists

Farmers List										
No.	Name	Address	Area (ha)	Year of registration	Conversion status	Internal approval result	Number of farmers	Number of farmers	Number of farmers	Number of farmers
1	John Mwangi
2
3
4
5
6
7
8
9
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100

- List complete? Last update of list?
- Check whether total number of farmers in list corresponds with information from the ICS coordinator.
- Spot check cross checking of farmers list with ICS documents (already done during sample inspections)
- Spot checking of list with last certified farmers list (same farmers? Major changes in the area? Correct conversion status for all farmers?)
- N° farmers present year = N° farmers last year – sanctioned/left + new farmers
- If farmers list = also summary of internal control, check whether 100% inspection have been completed



Training Manual on the Evaluation of Internal Control Systems

Appendices to the inspection report

In addition to report and farmers list, the following documents for the certification body should be attached to the ICS report:

- All farm re-inspection report forms
- Sanctioned farmers list
- ICS Manual (incl. all forms)
- 2-3 sample farm files (complete copy of all documents for 2-3 farmers).
- Samples of ICS farm documentation to illustrate any cases of problems described in the report, etc.
- Sample staff files and farmers training files, sample conflict of interest declaration (if not yet sent in previous years)
- Copy of purchase registers and receipts
- Export labels
- Processing report & documentation (if relevant)

Additional Annexes to the Inspection Report

- **Farm re-inspection reports**
- **Sanctioned farmers list**
- **ICS Manual / ICS forms and procedures**
- **2-3 sample farmers files (esp. problematic cases)**
- **Sample training or staff files**
- **Copy buying registers**
- **Labels**
- **Processing documentation**



Training Manual on the Evaluation of Internal Control Systems

Exercise Reporting

If a sample inspection has been done, this could be a good time to do the report writing exercise. Each participant tries to complete the ICS report form about the sample ICS Operator being audited. Many questions obviously cannot be answered after such a short period, but the participants can still try to answer the questions and give descriptions.

Depending on expertise level, participants might find it easier to do the reporting in groups of two in order to be able to discuss certain issues, etc.

The groups are given 1.5 or 2 hours and in the end the report is completed as a group on the presentation laptop. By doing so, all “tricky” questions can be discussed in a group and clarified. On the other hand, it takes a rather long time (2 hours minimum) and may be boring.

Alternatively, only the most critical issues/chapters can be completed together but all reports can be collected and evaluated by the trainer. Collection of the report is recommended anyway, in order to assess the level of understanding of the participants.

Evaluation for Certification

Relative importance of different criteria for the certification decision

As a minimum guideline for certification bodies and inspectors, the compliance criteria in the ICS report are given a certain weighting or "relative importance". Such weighting is not seen in any other organic standard, but in practice certification bodies will always take certain noncompliances much more serious than others.

E.g., there is a large difference in the importance of the following criteria: "all major noncompliances have been identified by the ICS" and "corrective measure have been communicated to the farmers".

Therefore each criteria has been given one out of 4 categories of relative importance.

A= MAJOR MUST, pre-requirement for certification

B= MINOR MUST to be corrected in the short term

C= MINOR MUST be corrected/implemented in medium term

D=recommendation

The categories only provide rough guidance for inspectors and evaluators. However, it was found that this relative categorization is useful during the inspection to estimate the impact of nonconformities on the overall certification decision.

The following interpretation of the impact on certification provides only a rough guideline for the certification body, which must be somehow related to the certifier's own sanction policy, i.e. what should be done if an 'A-criterion' is not met? → allow 2 weeks for correction and otherwise suspend??? De-certify and inform authorities???, etc.

'A-Criteria': in principle all 'A-criteria' must be fulfilled for certification. Depending on the criteria it may be possible that the operator submits proof on correction of an A criterion AFTER inspection, but before certification. It is possible that the fulfillment of the 'A-criteria' must be verified in an additional inspection.

'B-Criteria': must be fulfilled but operator is given an agreed-upon amount of time for correction. Also it has to be ensured that the operator fulfils at least a certain percentage of the criteria; i.e., an operator who has fulfilled all 'A-Criteria' but only very few of the many 'B-criteria' cannot be certified (before correction).

As a thumb rule the following minimum % are proposed:

first inspection: 50-70 %

follow up inspection: 60-80%

from 3rd year onwards: 90%

'C-Criteria': may be in development; i.e., the operator is given a longer time to work towards full compliance. Time frame is agreed upon with certifier.

Evaluation for Certification

The criteria are weighed

A: MAJOR non-compliance, pre-requirement for certification

B: Minor non-compliance to be corrected short term

C: Minor non-compliance to be corrected medium term

D: Recommendation



Relative Importance of Criteria

A In principle all 'A' Requirements must be fulfilled for certification

B Additionally, a certain percentage of 'B' requirements should be fulfilled. Partly fulfilled counts as ½ fulfilled.

- First inspection/first certification according to the proposed new system: app. 50-70% of all compliance criteria
- Follow-up inspection: 60-80%
- From 3rd year onwards app. 90% (rough guideline only)

C 'C' requirements need to be fulfilled in medium term; i.e. a certain timeframe has to be set for fulfilling these requirements.

Evaluation of important noncompliances

On the following slides a couple of important nonconformities are discussed in more detail and sanctions and corrective measures proposed. The same examples are also included in the inspection procedures document.

Less than 100% of internal inspection completed

Problem: ICS has not managed to inspect all farmers in a particular year (or before harvest or any other agreed upon season for the internal control).

Action: Investigate WHY 100% could not be completed? Was it a problem of a few farms who could not be inspected because, e.g., the inspector tried twice but never managed to meet the farmer or is it a larger scale, systematic problem?

If it is a minor problem, the missing inspections could possibly still be completed immediately (even if after harvest) and the growers would remain certified. Alternatively, all such farmers could be inspected by the certification body (additional inspection). Normally the ICS Operator will receive a strong warning to ensure that 100% are finalized well in time next year.

If it is a major/systematic problem: all farmers who have not been inspected internally are decertified; i.e., they are taken off the certified farmers list. They may possibly be kept on a special separate list to be 're-activated' again the following year, but in this case the conversion status of these farmers needs to be determined again in detail for next certification.

Motivation exercise: how should these important nonconformities be dealt with?

For the following examples of important nonconformities it is recommended to present the nonconformity first and let participants come up with their proposed sanctions and corrective measures.

(If presenting in PowerPoint, the proposed "solution" on each slide only appears after mouse click or RETURN key)

After presentation of the 'solution', the proposed sanctions and measures should be discussed.

Less Than 100% Internal Inspection



Not 100% of all farmers have been inspected by ICS in a certain year.

Option 1: the missing inspection can be done immediately and still count for the respective year
→ set conditions for next year to ensure 100% ON TIME.
(possibly additional external inspection)

Option 2: only those farmers are considered for certification that have been internally inspected

ICS has failed to detect major nonconformities

Probably most crucial and difficult case of evaluation is how to deal with the certification of an ICS Operator if major nonconformities have not been detected by the ICS.

Major nonconformity in this context is defined as any nonconformity that directly threatens the organic integrity of the product and which results in de-certification of the concerned product and/or fields.

In case the ICS has failed to detect such nonconformities, i.e. they were only discovered during the external farm re-inspections, it is important to investigate the case further:

- Why was it not detected? Was internal inspection really not thorough enough? Or did the inspector also have suspicions but could not find any proof? Or...
- When was the internal inspection? → Was the inspection before the actual application?
- Was the problem openly declared or did the farmer try to cheat? If it was openly declared, why was it not also declared to ICS?
- What was the reaction of field officer/internal inspector? Did he/she try to cover for the farmer or get involved in a thorough investigation of the case?
- Was it a problem of a certain inspector or general problem?
- Localize problem! → Only a special region/village? *Example: the intercrop that was found to be chemically treated was grown only in a small percentage of the registered farms. Or one village had particularly strong drought problems and only there the farmers used urea.*
- Number of cases? → If you find cases of undetected major nonconformities you need to increase the re-inspection rate. Yet only a small percentage of farms will be re-inspected so if you find 2 farmers out of 20 re-inspected farmers it could potentially mean that 10% of all farmers are noncompliant.
But possibly you could already localize the problem to a certain region or inspector only and then the overall picture is different. (2 farmer = 10% in one subgroup, but 0 farmers for 90% of all other subgroups).

Major Non-compliances Not Detected (1)

A non-compliance that threatens the organic integrity of a product was not detected by the internal control.

E.g., organic crop or an intercrop on an organic plot was sprayed with pesticide

Detailed Investigation



- Why was it not detected?
- When was the internal inspection?
- Was the problem openly declared or was there an attempt to cheat?
- Reaction of field officer/internal inspector?
- Problem of inspector or general problem?
- Localize problem!
- Number of cases?

Consequences if the ICS has clearly failed to detect major noncompliances in several cases

- The inspection is finalized (but MINIMUM highest risk level number of farm inspections).
- The ICS is given a warning to immediately improve, correct the problem, and conduct a second round of internal inspections.
- The inspector informs the certifier of the situation immediately and the certifier confirms the sanction in writing. Usually certification will need to be suspended.
- In severe cases, certification may even be revoked with immediate effect (if the ICS has really failed completely).
- The correction of the problem usually has to be verified in a second inspection before certification can be granted.
- Depending on the scope of the problem, the second inspection may only focus on identified weaknesses, or a complete new round of farm inspections may be necessary.

Considerations:

The 'new' inspection protocol poses a lot of responsibilities on the ICS and hence allows quite low re-inspection rates. Thus, severe sanctions are needed if the ICS has clearly failed.

On the other hand, it should also be considered that nobody is perfect and that even a good inspector might not ALWAYS detect a certain nonconformity.

Therefore for determination of the actual sanctions it is really important to evaluate the overall situation and the actual scale of the problem.

Consequences if the ICS has failed to detect noncompliances in few cases only and/or due to obvious reasons

It also may be found that the problem was really only very local (e.g., only one unqualified internal inspector) or really could be proven to be an exception/single case.

Or the reasons for non-detection were obvious, e.g., internal inspection was BEFORE the application, although in principle the internal inspection was timed well.

In this case the following consequences are proposed:

- Operator is 'high risk category'. Re-inspection rate is increased accordingly. In most cases even more re-inspection will be necessary to localize the problem or confirm that it is only single case.
- If this happens for the first time, a warning to improve the ICS will usually be sufficient. Ensure that all potentially concerned farmers are immediately inspected a second time by the ICS.
- Correction of reasons for the problem (e.g., additional training for weak inspector, etc.) is required. Proof of correction is required before certification.

Major Non-compliances Not Detected (3)

Case: The ICS has failed to detect the problem in a few cases but due to obvious reasons

(e.g. spraying occurred after internal inspection, although in principle inspection was timed well)

➔ Increase inspection rate to high risk situation, ensure that the problem was really a single problem, not a general pattern that indicates a structurally inefficient ICS.

➔ If this happens for the first time usually a warning to improve the ICS will be sufficient. Ensure that all potentially concerned farmers are immediately inspected a second time by the ICS.

➔ Correction of reasons for the problem (e.g. additional training for weak inspector, etc.) is required. Proof of correction is required before certification.



Other Non-Compliances not detected

ICS has failed to detect certain nonconformities, but these problems do not threaten the organic integrity; i.e., the problem will not lead to de-certification of the farm or of products.

Examples:

- ICS failed to detect processing aids, but they were permitted.
- ICS failed to detect use of copper or other allowed substances.
- ICS failed to find out that a farmer still had conventional units (but the certifier would not have de-certified the farmer for that reason).
- ICS failed to detect the use of treated vegetable seeds on the organic plot, but according to sanction policy of certifier this would not lead to de-certification of the plot (because compulsory per phyto-sanitary law).

Consequences

- ICS must be improved; all internal inspectors must be trained on this component, etc.
- Depending on the problem, a second round of inspections could be necessary.

Principles of dealing with a weak ICS

- In the end the certifier needs to be confident that the inspection and quality assurance is sufficiently handled by the ICS so that the organic certificate can be granted on basis of the assessment of the ICS.
- If the ICS is not yet functioning well, the ICS needs to be improved. The ICS should not be “replaced” by high external control rates in the long run.
- However, the group (and the certifier) may need some time to adapt the system satisfactorily; therefore transitional procedures are necessary for the time that the ICS is not yet fully functional, so in some cases rather high external re-inspection rates may be the only solution.
- In most cases, however, it is more appropriate to let the ICS make certain improvements and then come back for a second inspection, instead of imposing very high external control rates. Obviously the evaluation also depends on whether only “formal aspects” of an ICS remain unfulfilled or whether there is in fact no functioning monitoring system / quality assurance system in place at all.

Principles in Dealing with a Weak ICS

- Overall, the ICS inspection and quality assurance must be sufficient to grant the organic certificate on basis of the assessment of the ICS
- If the ICS is not yet functioning well, the ICS needs to be improved. The ICS should not be “replaced” by high external control rates in the long run.
- In most cases → let the ICS do certain improvements → come back for second inspection.
- If ICS really not functional at all → improvement will need time → transitional high re-inspection rates may be needed until ICS fully functional.
- Only „formal aspects“ of an ICS are not yet fulfilled or in fact no well working monitoring system / quality assurance system in place.

Identified problem: Commingling

The consequences in case of commingling (organic/conversion or organic/nonorganic) are usually quite clear: the respective lots are de-graded to conversion and conventional, respectively.

For determination of additional sanctions it is, however, also important to investigate the problem in detail:

- What happened, how was the mistake made? Was it a systematic mistake or rather a single case? If the problem could occur again any moment because the system is weak and inappropriate → immediate improvement of the system (training of purchasing/handling personnel, change of buying/handling system, change of buying/handling procedures, etc.)!
- Fraud or error?
- Is the lot number system consistent enough to find all affected lots?

Normally, commingling cases (at least severe ones) will result in an unannounced additional inspection during next buying/handling.

Co-mingling

Organic Products have been mixed (at any stage) with conversion or conventional products



- Thorough investigation: what happened, who was responsible, how could it happen, etc.
- Is there any consistent lot number system or has the whole batch been co-mingled?
- De-certification of the concerned lots.
- Additional corrective measures to prevent the same incident.
- Usually additional sanction: unannounced additional inspection during next purchase.

Finalization of Evaluation & Certification

After all noncompliances have been evaluated and sanctions proposed the inspector sends the final report (usually an electronic version plus the original paper version) along with the checked farmers list and all appendices to the certification office for certification.

In the ICS office, the results of the inspection are evaluated and a certification decision is made.

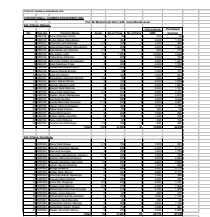
Certification documents for a smallholder group will normally be:

- Certificate for the group
- Certified farmers list: It is highly recommended that one clear ORIGINAL list be prepared; the list should be dated and stamped and/or signed. This system makes it 100% clear for the ICS Operator, buying personnel, and future inspectors which list accurately identifies certified farmers at a certain stage. Each ICS Operator usually continuously updates the farmers list, adds new farmers, etc., and in big organizations it can be quite confusing which farmers have effectively been certified in the previous year.
- Certification decision: letter with certification decision and certification conditions (corrective measures).

Reporting to the Certifier



Inspection report
(computerized/more
comments included)

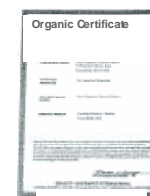


Checked farmers list

APPENDICES



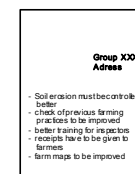
Certification



Certificate for
the group



Certified Farmers List
(, original', i.e. with stamp, signature,
date)



Certification Decision with
necessary corrective measures



SMALLHOLDER GROUP CERTIFICATION

*Guiding Documents for Organic Inspectors and Certification
Personnel on the Evaluation of Internal Control Systems
(Supplements to the Training Curriculum)*

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Principles of Organic Agriculture

Preamble

These Principles are the roots from which organic agriculture grows and develops. They express the contribution that organic agriculture can make to the world, and a vision to improve all agriculture in a global context.

Agriculture is one of humankind's most basic activities because all people need to nourish themselves daily. History, culture and community values are embedded in agriculture. The Principles apply to agriculture in the broadest sense, including the way people tend soils, water, plants and animals in order to produce, prepare and distribute food and other goods. They concern the way people interact with living landscapes, relate to one another and shape the legacy of future generations.

The Principles of Organic Agriculture serve to inspire the organic movement in its full diversity. They guide IFOAM's development of positions, programs and standards. Furthermore, they are presented with a vision of their world-wide adoption.

Organic agriculture is based on:

- The principle of health
- The principle of ecology
- The principle of fairness
- The principle of care

Each principle is articulated through a statement followed by an explanation. The principles are to be used as a whole. They are composed as ethical principles to inspire action.

Principle of health

Organic Agriculture should sustain and enhance the health of soil, plant, animal, human and planet as one and indivisible.

This principle points out that the health of individuals and communities cannot be separated from the health of ecosystems - healthy soils produce healthy crops that foster the health of animals and people.

Health is the wholeness and integrity of living systems. It is not simply the absence of illness, but the maintenance of physical, mental, social and ecological well-being. Immunity, resilience and regeneration are key characteristics of health.

The role of organic agriculture, whether in farming, processing, distribution, or consumption, is to sustain and enhance the health of ecosystems and organisms from the smallest in the soil to human beings. In particular, organic agriculture is intended to produce high quality, nutritious

food that contributes to preventive health care and well-being. In view of this it should avoid the use of fertilizers, pesticides, animal drugs and food additives that may have adverse health effects.

Principle of ecology

Organic Agriculture should be based on living ecological systems and cycles, work with them, emulate them and help sustain them.

This principle roots organic agriculture within living ecological systems. It states that production is to be based on ecological processes, and recycling. Nourishment and well-being are achieved through the ecology of the specific production environment. For example, in the case of crops this is the living soil; for animals it is the farm ecosystem; for fish and marine organisms, the aquatic environment.

Organic farming, pastoral and wild harvest systems should fit the cycles and ecological balances in nature. These cycles are universal but their operation is site-specific. Organic management must be adapted to local conditions, ecology, culture and scale. Inputs should be reduced by reuse, recycling and efficient management of materials and energy in order to maintain and improve environmental quality and conserve resources.

Organic agriculture should attain ecological balance through the design of farming systems, establishment of habitats and maintenance of genetic and agricultural diversity. Those who produce, process, trade, or consume organic products should protect and benefit the common environment including landscapes, climate, habitats, biodiversity, air and water.

Principle of fairness

Organic Agriculture should build on relationships that ensure fairness with regard to the common environment and life opportunities

Fairness is characterized by equity, respect, justice and stewardship of the shared world, both among people and in their relations to other living beings.

This principle emphasizes that those involved in organic agriculture should conduct human relationships in a manner that ensures fairness at all levels and to all parties – farmers, workers, processors, distributors, traders and consumers. Organic agriculture should provide everyone involved with a good quality of life, and contribute to food sovereignty and reduction of poverty. It aims to produce a sufficient supply of good quality food and other products.

This principle insists that animals should be provided with the conditions and opportunities of life that accord with their physiology, natural behavior and well-being.

Natural and environmental resources that are used for production and consumption should be managed in a way that is socially and ecologically just and should be held in trust for future

generations. Fairness requires systems of production, distribution and trade that are open and equitable and account for real environmental and social costs.

Principle of care

Organic Agriculture should be managed in a precautionary and responsible manner to protect the health and well-being of current and future generations and the environment.

Organic agriculture is a living and dynamic system that responds to internal and external demands and conditions. Practitioners of organic agriculture can enhance efficiency and increase productivity, but this should not be at the risk of jeopardizing health and well-being. Consequently, new technologies need to be assessed and existing methods reviewed. Given the incomplete understanding of ecosystems and agriculture, care must be taken.

This principle states that precaution and responsibility are the key concerns in management, development and technology choices in organic agriculture. Science is necessary to ensure that organic agriculture is healthy, safe and ecologically sound. However, scientific knowledge alone is not sufficient. Practical experience, accumulated wisdom and traditional and indigenous knowledge offer valid solutions, tested by time. Organic agriculture should prevent significant risks by adopting appropriate technologies and rejecting unpredictable ones, such as genetic engineering. Decisions should reflect the values and needs of all who might be affected, through transparent and participatory processes.

A. INSPECTION AND CERTIFICATION PROCEDURES

SMALLHOLDER GROUPS WITH INTERNAL CONTROL SYSTEMS (ICS)

1. Principles & Definitions

- With the “new” system of smallholder group certification as presented in this ICS inspection protocol, IFOAM aims to minimize inspection and certification costs for producers in developing countries and support harmonization in the field of smallholder group certification. At the same time, minimum formal requirements for certification must be met, as requested by certifiers and authorities (laws), and the organic integrity of production has to be ensured.
- A smallholder group is considered as single operator in the certification process (one contract, one overall report, one certificate for the group).
- In principle, every smallholder group should be certified on the basis of a fully functioning ICS. If the ICS is not (yet) functioning well, the ICS needs to be improved. The ICS should not be “replaced” by high re-inspection rates in the long term. However, the group (and the certifier) may need some time to adapt the system satisfactorily; therefore transitional procedures are necessary for the time that the ICS is not fully functional.
- It is important to keep in mind that for group inspections the main focus of the inspector should be on the ICS and that farm re-inspections (external re-inspections) are only a part of that ICS evaluation. External sample farm inspections should be planned very carefully in order to deliver sufficient results for all potentially critical aspects of the ICS, even with a rather small number of re-inspected farmers. While the system presented in this document requires fewer farm inspections than most certifiers used to do, the overall ICS evaluation, risk assessment, and analysis of critical control points become much more important and time consuming.

Important Terms

ICS Manual	Compilation of all written procedures and forms of the ICS (not necessarily organized yet as “manual”); see requirements of the ‘IFOAM ICS Guidance Manual for Producer Groups’ or the ‘ICS Certification Compliance Criteria’ document
Re-Inspection	External farm inspection / external sample farm inspection aiming to assess the quality and efficiency of the ICS.
Approval/Certification	Approval = ICS’s decision on compliance Certification = Certifier’s decision on compliance according to certification standard

2. Application for Certification and Preparation of Inspection

Application for certification

- For inspection planning and preparation of the inspection, the applicant shall submit the complete ICS Manual to the certifier, including a description of all activities related to organic production.
- The smallholder group shall receive the IFOAM ICS guidance manual for preparation well before the external inspection, so that the ICS can be adapted to the new system as much as possible before the certifier’s inspection visit.

Re-inspection rates and inspection planning

Inspection planning of certified organic operators with implemented ICS

- Risk levels can be estimated from previous inspection results and reports. Critical aspects as well as the quality of the ICS are from previous visits. *Note: see risk assessment checkpoints in the report for determination of risk category.*
- The following number of re-inspections should be planned:
N= Number of group members (in organic program)

Minimum number of farms to be inspected by the certifier			
Number of Group Members	Normal risk factor 1 (square root of n)	Medium risk factor 1.2 (1.2 square root of n)	High risk factor 1.4 (1.4 square root of n)
Minimum	10	12	14
50	10	12	14
100	10	12	14
200	14	17	20
500	22	27	31
1000	32	38	44
2000	45	54	63
5000	71	85	99

NOTE: If there are different project sites, farmers in every project site should be inspected → plan sufficient time to visit all project sites. Average number of farmers/day is 4-7 (depending on distance and size/complexity of the farms). If you are not sure about the risk level, it's better to plan for too much time than too little.

- Inspection time needed for formal ICS evaluation at ICS office and for formal risk assessment in addition to the farm re-inspection days.
Rough estimation of time needed in ICS office: 1-2 days for groups of 100-500 farmers (depending on number of sites, complexity of the ICS and the production system, etc.); 2-3 days for 500-1000 farmers).
- Additionally, at least 0.5 days preparation time for the inspection is necessary.

Special Situation Inspection: Planning First Inspections

(also applies to inspection in the first year of introduction of new ICS scheme)

- The expected risk category (low/medium/high) of the smallholder group is assessed based on experience with similar projects/crops in the same area as well as on information from the applicant. In most cases it is recommended to assume a high-risk situation for planning purposes.
- Preliminary assessment (based on information from the applicant) of whether there is already a functioning (preliminary) formal internal control system, according to requirements of the IFOAM ICS Guidance Manual, in place.
- Scenario 1: ICS in place. The time needed for ICS inspection and external farm re-inspections is estimated as described above. The aforementioned re-inspection rates are taken as a first estimation, but it is advisable to increase the number of re-inspected farms for the first inspection, especially if a medium or high risk situation can be expected. A substantial increase is recommended for high-risk situations.

Rationale for higher re-inspection rates during the first inspection (or first introduction of new inspection scheme): if the ICS system is not yet well established, the ICS might not even have knowledge of the current situation on the registered farms (e.g., non-organic intercrops); therefore the inspector cannot be sure to have chosen the "critical" farms for re-inspection and to have identified all relevant risks if the percentage of inspected farms is quite low. For existing certified groups time may be needed to adopt the "new" formal ICS. In addition, it is

not yet clear how different import authorities in Europe will implement the new smallholder group certification scheme (as also defined in EU guidance documents on organic group certification in developing countries). In principle, all major authorities have confirmed that they will apply the new system, but their actual acceptance of lower re-inspection rates in high-risk situations is not yet known.

- Scenario 2: no formal ICS yet in place → inform smallholder group of ICS requirements and advise it to set up an ICS with plenty of time before inspection and preferably plan for a pre-audit (focus on risk assessment and ICS, inspection of a couple of representative farms to assess the overall risk). If no formal ICS can be installed, there is still an option to certify a group of farmers (as a group), but ALL farmers would be individually inspected by the external inspector.

Preparation of the inspection by the inspector

The inspector should receive the ICS manual as well as a description of the group before the inspection and should have studied the documents well. The purpose of the preparation is to:

- Understand the system and the procedures
- Identify existing principal weaknesses/deficiencies in the documents and forms (evaluation of forms can start before inspection)
- Prepare a draft list of potential critical control points—and further check during inspection.

3. Inspection

Inspection Procedures

The following activities are part of a complete ICS inspection:

Inspection of the ICS office

- Interview the ICS manager on project overview (number of farmers, project organization), problems/important issues of previous year, any changes in the ICS manual
- Evaluation of the internal ICS manual (started before inspection): do the procedures and forms fulfill the minimum requirements? If parts are missing in the manual, are they known (but not written down), or is there no procedure in place for the respective aspect? After inspection: are the described procedures effectively implemented?
- Evaluation of the internal organic standard (already started before inspection): complete and sufficient with regard to minimum requirements of the applicable organic regulations/standards?
- Screening of random farm files (documentation of ICS on each farmer)
 - Check several files for each internal inspector
 - Documents available and complete?
 - Cross-check information with farmers lists (compare certified farmers list of previous year as well as new updated farmers list submitted by ICS); is information consistent?
- Focus on sanctions: check all noncompliances and sanctions identified by ICS: what were the identified problems, sanctions, and reactions by ICS? Were the measures taken appropriately? Have sanctions been effectively implemented? Check farm files, sanctioned farmers list, buying lists, etc., to check documentation and implementation of the sanction.

- Approval procedures: how were approval/disapproval decisions made and by whom? How are decisions documented? Especially important: for new farmers, who decides on the proposed conversion status?
- Verification of farmers list: complete? Changes compared to last year (number of farmers, areas, crops, yield estimates) – spot checks. Who manages the farmers list and how/when is information updated? How high is the risk of data loss or data being changed accidentally in this process?
- Staff qualifications and training: check staff files and training records. Have there been a lot of changes in staff? If so, how were the newcomers trained (if any doubts about their qualification should arise, check their work specifically). Interview a few field advisors (if not the same as internal inspectors).

Selection of Farmers for Re-inspection

- The overall re-inspection rate is usually set by the certifiers in the application/preparation process, or else is determined by the inspector according to risk categorization (see chapter on re-inspection rates).
- Additionally, it is important that farmers at all different project sites (if their operations are substantially different) are re-inspected. Ideally, enough farmers are inspected to assess the work of ALL internal inspectors.
- Selection of farmers: done by the inspector at the beginning of the inspection. The aim is to get a representative picture of farmers in the project as well as of the work of the internal inspectors. Of course practical aspects (accessibility, convenient tour planning) must also be considered.
- If the project does not have clearly distinct project sites, but only various different villages, select a random choice of villages. If possible villages can be grouped according to the intercrops they grow or to similar criteria.
- Focus on potential risks and critical control points; i.e., the inspector should have already some idea what might be potential problems and then check on these aspects specifically. *Example: there is high chance that farmers have applied prohibited inputs in cardamom this year because cardamom price is very high and cardamom is often sprayed → chose a couple of farmers that have intercropped cardamom on their organic pepper plot.*
- If several farmers had to be sanctioned by the ICS, inspect similar farmers (neighbors, same village, same crops, etc.).
- Make sure to inspect bigger farms (who may not fulfill the definition of being “smallholders”).

Re-Inspection of Farmers

- The Re-inspection Report Form should be used for farm inspection.
- The inspection should always include an interview with the farmer (or representative).
- The aim is both a thorough inspection of the farm (like any farm that is inspected individually) as well as an assessment of the efficiency of the ICS.
- Therefore the following aspects have to be checked (*depending on certifiers policies and certification standard*):
 - Farm unit: have all plots/fields been registered, has farmer bought new land, leased out land, etc.?
 - Non-organic fields: what crops? No parallel production? Understand non-organic methods roughly. Assess risk to organic production (drift, rotation of organic fields to non-organic fields?).
 - Cultivation and use of inputs: visit fields (not necessarily all), interview, review documentation.
 - Storage of inputs, tools (sprayers, etc.)

- Livestock (animal welfare, fodder, medication, etc.)
- Post-harvest processing
- Storage of final products
- Cross-check all information with the ICS documentation on that farmer.
- Cross-check purchase figures (buying summaries) with the farmer’s information and yield estimates.
- Another focus of re-inspections is to assess the farmer’s level of understanding of organic farming and ICS procedures as well as the assessment of qualifications of ICS field staff.
- Especially during first inspections, or in case of suspicion, it is also recommended that a few farmers in the neighborhood be visited to enquire about information regarding their organic neighbor as well as their own farming practices. Other sources of information can also be important for overall risk assessment: pesticide stores, local NGOs, governmental farm extension officers, etc.

Witness Internal Inspections

- In addition to re-inspections, witness internal inspections can be done. If they are found to be useful, internal inspectors could be accompanied during a “normal internal inspection”.
- The aim is to assess the quality of the internal inspection and to understand current procedures. The internal inspector is asked to perform a complete internal inspection: planning of the inspection (announcement to farmer?), preparing all documentation, farm/field visit, interview with farmer, completing internal inspection report, reporting back to the office.
- The inspector accompanies the internal inspector during the whole process and takes notes regarding his/her performance.
- The evaluation of the inspector’s performance is best combined with an evaluation of training of internal inspectors and with checks of their overall knowledge of organic farming, the internal organic standard, ICS procedures, etc.

Risk Assessment during Inspection:

- The whole inspection shall be based as much as possible on a risk approach; i.e., the inspector should at all times be aware of the relevant risks and most critical control points and check on them throughout the inspection. The risk assessment checklist in the appendix to the IFOAM ICS Guidance Manual can be used as a useful tool for a complete risk assessment.
- The formal risk assessment in the report is only a summary of very important potential risks in order to determine the “risk category” which determines the re-inspection rate. *Note: risks on buying level are critical for inspections, but do not necessarily influence the risk categories for determination of the re-inspection rate (more re-inspections usually do not provide more information about potential buying problems).*
- At the end of the inspection, relevant risks at all levels are assessed and evaluated (see inspection report). The risk assessment checklist in the report is completed and all relevant and most important potential risks are described and evaluated.
- The risk category is determined on the basis of this risk assessment. The chosen risk category has to be justified. As rough guidance the respective risk categories can be defined as follows (with regard to risk checklist in report):

“Normal” risk (low risk)	<ul style="list-style-type: none"> ● 1-3 identified risks
Medium Risk	<ul style="list-style-type: none"> ● 3-5 identified risks
High Risk	<ul style="list-style-type: none"> ● more than 5 risks ● any case that major noncompliances have not been identified by the ICS

- As long as a risk category is not yet clear, most certifiers will plan new inspections as “high risk” to be on the safe side regarding re-inspection rates. Therefore the risk categorization by inspectors will mainly be used as basis for next year’s inspection planning. Anyway the inspector should make sure that he/she has inspected a sufficient number of farmers to meet the required minimum number for the respective risk category.

Inspection of Purchase Centers

- Each purchase center has to be inspected. Check the exact product flow and handling steps.
- Check the qualifications of purchase personnel; staff should explain/demonstrate their standard procedures during purchasing.
- Check detailed product flow verification (purchase lists, delivery lists to processing unit, incoming records processing unit) of last purchase season. Have harvest estimations been checked and respected? How has the organic status of farmer been determined? Have all purchases been duly documented?
- Check labeling .
- Check (intermediate?) storage rooms.
- Focus on possibilities of (accidental/intentional) commingling. How is separation (organic – conversion – non-organic) ensured?

Inspection of Processing Units and Storage

- All processing units and warehouses are inspected according to the certifier’s procedures.
- Focus on product flow calculations; cross-check with buying lists, transport documents, etc.

Reporting

- The findings of the inspection are summarized during the inspection in the inspection report. Usually this means that the report format is roughly completed on paper (mainly compliance check, a few keywords for the descriptive part) and the table of nonconformities/corrective measures is completed. The findings are discussed with the ICS Manager, who countersigns the report.
- The same report format is used after the inspection to prepare the computer version of the report (if required by certifier) in which additional information can be given and which can be easily further processed by the certifier.
- Explanation of how to use the report form to assess compliance with certain criteria:

OK	Compliance criteria are fully met (in all listed details) If a particular issue is not a problem, the criteria should be checked as OK (not as ‘not applicable’). E.g., there is no contamination of products → OK (not N/A)
PF	A compliance criterion is met in principle, but a few details are not (yet) fulfilled. With a minor correction, full compliance can be ensured. <i>E.g., there is a farmers list, but one required piece of information in the list is missing although it is registered on the basic data form. Or: a certain procedure is planned and communicated to all staff, but is not yet written down.</i>
NO	Requirement is not fulfilled; the corrective action to meet the requirement will normally require efforts/change in procedures, etc., and may need time.
N/A	ONLY IF RESPECTIVE criterion is really not applicable, not if it is simply no problem/ok. In principle all questions shall be answer with OK/PF/NF; N/A should only be ticked if the question really is not relevant because the described issue is not found in the project. Attention: where the N/A field is grey, the question cannot be answered as N/A.

	<i>Example: all questions regarding part conversion are not applicable if the full farm is organic. (All “if” or “in case of” questions). BUT the question “there is no contamination” must be answered (“OK”) and not marked as not applicable.</i>
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- If the same report form is used every year, it is obvious that the descriptive parts do not need to be collected each year but to be checked only whether they are still correct compared to last year’s report. Alternatively the form used for follow up inspections leaves out all descriptive parts straight away.

4. Certification

Note: Each certifier will have its own sanction policy and sanction categories and since ICS certification is a very complex overall evaluation, the following rules can only be considered general guidelines to be implemented in the certifier’s own sanction system.

Weighting of different noncompliances

- Similar to the EUREPGAP inspection system, certain compliance criteria have been defined for each aspect of the standard document and each compliance criterion is given a certain (relative) weighting:
 - A: MAJOR MUST, pre-requirement for certification
 - B: Minor MUST to be met in the short term
 - C: Minor MUST to be met in the medium term.
 - D: recommendation

Requirements for certification

- All ‘A’ Requirements shall be fulfilled for certification.
- Additionally, a certain percentage of applicable ‘B’ requirements shall be fulfilled
 - First inspection/first certification according to the new-system: app. 50-70%
 - Follow-up inspection: 60-80%
 - From 3rd year onwards 90%

Rough guideline only, the idea is not to come up with a compliance score but to serve as a rule of thumb.

- ‘C’ requirement need to be fulfilled in medium term; i.e., a certain timeframe has to be set for fulfilling these requirements.

It also is up to the certifier’s sanction policy, how an operator will best be obliged/reminded to correct non-conformities.

Important noncompliances and their sanctions

Certain minimum corrective measures and sanctions are defined for a few of the severe/critical non-compliances:

Inspection’s Finding	Proposed additional investigation, corrective measures and sanctions
Less than 100% of the farmers has been inspected by ICS in a certain year.	<ul style="list-style-type: none"> ▪ Option 1: the missing inspection can be done immediately (max 2 months after normal deadline) and still count for the respective year → only condition for next year is to ensure 100% ON TIME ▪ Option 2: only those farmers who have been internally inspected are

<p>The findings of the inspection differ considerably from the findings of the internal inspections: <u>use of prohibited inputs on organic plots or other non-compliances that directly threaten the organic integrity of the product have not been detected</u> by ICS</p>	<p>considered for certification.</p> <ul style="list-style-type: none"> ▪ Thorough investigation of each such case: what was the reason for non-detecting the problem? Was the internal inspection AFTER the use of inputs? Can the ICS really be expected to have detected the problem? Was it intentional or non-intentional? Has the problem only occurred with one particular inspector or is it a general problem? Try to localize the problem as much as possible (e.g., only one village, one internal inspector, etc.) ▪ <u>Option 1: the ICS clearly failed in detecting the problem</u> The inspection is finalized (but with number of re-inspections as required for highest risk category) and the ICS given the warning to immediately improve the ICS, conduct second round of internal inspections, etc. The inspector informs the certifier immediately of such situation and the certifier confirms the sanction in writing. The correction of the problems usually has to be verified in a second inspection before certification can be granted. Depending on the scope of the problem, the second inspection will focus only on the identified weaknesses, or a complete new round of farm inspections, etc., may be necessary. It probably will be necessary to suspend certification until proof on correction is given. ▪ <u>Option 2: ICS missed a few cases, but due to evident causes</u> → increase inspection rate to high risk situation, ensure that the problem was really a single problem, not a general pattern that indicates a structurally inefficient ICS. → if this happens, the first time a warning to improve the ICS will be sufficient. Ensure that all potentially concerned farmers are immediately inspected a second time by the ICS. → correction of causes of the problem (e.g., additional training for weak inspector, etc.) is required. Proof of correction is required before certification. No suspension if ICS can submit evidence of correction in reasonable time (1-2 months).
<p>The findings of the inspection differ considerably from the findings of the internal inspections: <u>other aspects that do not directly threaten the organic integrity of the product</u> (lack of thorough investigation on certain issues, missed out certain parts of inspection etc.)</p>	<ul style="list-style-type: none"> ▪ Corrective measures to improve the internal inspections. ▪ Possibly, a second round of internal inspections may be necessary. <p>(covers all cases where the inspection was not complete but in aspects that would not lead to a de-certification of farms)</p>
<p>Commingling of products at any stage (organic, conversion, non-organic)</p>	<ul style="list-style-type: none"> ▪ Thorough investigation: what happened, who was responsible, how was it possible? etc. ▪ De-certification of the concerned lots. ▪ Additional corrective measures to prevent the same incident. ▪ Usually additional sanction: unannounced additional inspection during next purchase.

Certification Documents

- The certificate is issued for the whole group. Processing/exporting certificates may of course be separate certificates.
- The farmers list (with specific date of certification) is attached to the certificate and becomes the “certified farmers list”. If the conversion status (as confirmed by the certifier during the last certification) of a group of farmers changes during the inspection year, the ICS must submit the new farmers list (e.g., with some conversion farmers now in organic status) during the year for renewed certification by certifier.
- For import authorizations, etc., a group is considered as single producer/operator.

Overview of ICS Inspection

PREPARATION

- Read ICS manual
- Start evaluation of forms and procedures/policies

ICS OFFICE

- Overview/changes
- Evaluation of ICS forms: contract, basic data form, internal inspection report form, maps
- Screening of random farm files (documentation of ICS on each farmer)
- Problems & sanctions
- Approval procedures & farmers list.
- ICS organization, staff qualifications and training
- Overview of internal inspection, selection of farmers for re-inspection, preliminary risk assessment

RE-INSPECTION OF FARMERS

- Thorough inspection of the farm (including post-harvest handling)
- Cross-check all information with the ICS findings & documentation on that farmer
- Cross-check purchase figures and yield estimates
- Farmer's level of understanding of organic farming
- Qualifications of ICS field staff, conflicts of interest
- Confirmation of findings of ICS office visit
- Visit neighbors, pesticide stores, local NGOs, governmental farm extension officers, etc.

WITNESS INTERNAL INSPECTION

- Assess the quality of the internal inspection
- Assess qualifications of ICS staff

BUYING CENTERS

- Only buying from organic farmers?
- Buying documentation complete & consistent?
- Separation measures and prevention of contamination
- Production flow control calculations

HANDLING/PROCESSING/EXPORT

- No contamination
- Separation/no commingling
- Labeling
- Certifiers normal procedures for warehouse/processor/export inspection & certification

B. ICS CERTIFICATION REQUIREMENTS AND COMPLIANCE CRITERIA

Basic ICS certification requirements

1. The necessary minimum requirements for smallholder group certification are fulfilled. Farms are inspected annually by the certification body.
2. All relevant parts of the ICS manual and description of ICS procedures must be made available in adequate form to the persons responsible for implementing the respective requirements or procedure. Farmers have access to the manual.
3. The ICS manual is up to date and reflects the procedures to be implemented as well as current organic standard requirements.
4. At the first inspection the ICS Operator must give a description of all operation units/premises and activities.
5. Risks that might jeopardize the organic quality of the product at the different levels of farm production, transportation, storage, processing, and export must be known and taken into account in all internal control procedures.
6. An internal organic standard outlines in an adequate form the farm production requirements and takes account of all applicable standards as far as these requirements are important and relevant to the operation.
7. Each registered organic farmer must be inspected by the internal control once a year. The internal inspection must be documented.
8. For each farmer, the ICS must have a yield estimate of the expected quantities of the organic cash crop(s) for each season.
9. The ICS makes clear approval or sanction decisions. When non-compliances are found, appropriate corrective or mitigating measures must be taken.
10. The internal control is documented. The ICS ensures that the documentation relating to certification is available for each farmer.
11. The different duties of the ICS are assigned to designated staff. All staff members are aware of their responsibilities and qualified for the respective tasks.
12. The objectivity of the decisions of the ICS may not be jeopardized by conflicts of interests.
13. Farmers are familiar with the certification requirements and appropriate organic production methods.
14. Buying and handling procedures ensure a separate and well-documented product flow of organic produce and prevent contamination of the organic product.

The certification requirements are verified by checking the following compliance criteria.

The list of criteria is sorted according to the inspection process, thus serves as a guideline document for the inspector through the inspection process.

If two inspection parts are indicated (e.g., ICS office/Re-inspections) it means that the respective control point is first checked in ICS office, but then also counterchecked / confirmed during re-inspections.

The results of the inspection are documented in the ICS inspection report (each compliance criterion has the same number in the report and in this guidance document).

ICS COMPLIANCE CRITERIA

A: Major MUST: pre-requirement for certification, the criterion must “in principle” be fulfilled to grant certification

B: Minor MUST-short term: important requirement; shall be fulfilled within a year (1-12 months) if not yet met

C: Minor MUST-medium term: requirement shall be implemented at least in medium term (1-3 years).

D: Recommendation

Note: these are relative indications of importance. It is still up to each certifier’s policy to either “upgrade” certain requirements (e.g., A instead of B), or to consider a certain requirement in a certain project as important (e.g., B) and hence demand compliance in the short term.

WHERE	Chapter in report	Compliance Criteria		How to check	Comments for the inspector
1.CB Application (background info for inspector)	4.3.1	To be considered a “smallholder” the following must be fulfilled <ul style="list-style-type: none"> • Cost of individual certification is disproportionately high (more than 2% of commodity value) in relation to sales value of the product sold. In addition, at least 3 out of 5 of the following requirements shall be fulfilled: <ul style="list-style-type: none"> • Average income lower than app. US\$5000/yr • Farm units are mainly managed by family labor. • Low-tech production system • Limited capacity of marketing on his/her own • Limited capacity for storage/processing 	A	Average income per farmer? Characteristics of farmers in the project (ICS manual, farmers list) (keep your eyes open during the re-inspections whether there are any farmers who don’t really comply with these criteria)	Mainly important at first inspection. The different criteria should be measured as an average over some period of time. It is not the idea that farmers are smallholders on and off over the years. The matrix is a flexible (soft) tool and certification bodies can adjust it to their views, as long as they justify their decision. Smallholder projects can be farmers associations or individual farmers organized by processor/exporter or by an NGO
1.CB Application	4.3.2	There is homogeneity of members in terms of geographical location, production system, size of holding	A-B		At least within a certain project site. Between different project sites there may be certain heterogeneity that can be tackled by different inspection methods for the different project sites.
1.CB Application	4.3.3	Marketing of the organic products is carried out as a group	A	Do farmers also sell to other buyers as organic?	Refers to marketing as certified organic, not to local sales, obviously. In some cases farmers may be allowed to sell the organic products to different buyers, but even in this case the buying is organized and supervised by the ICS.
1.CB Application	4.3.4	Projects that do not qualify as smallholder group certification can still be certified as an organized group of growers (assistance in documentation, joint marketing, etc.) with centrally coordinated marketing system, but each member farm has been inspected by the certification body and has to keep its own documentation	-	→ CB during Application Process	

WHERE	Chapter in report	Compliance Criteria		How to check	Comments for the inspector
2.Preparation of inspection /ICS office	3.2.1	An overview of the organic operation sites must be available, including a general overview of the farming system and agricultural practices of participating farmers.	B	→ check ICS manual or project descriptions submitted to certifier	Information must be available, at very least orally. If necessary, the inspector can assist the ICS Operator by collecting this information for the project in the inspection report.
2.Preparation of inspection /ICS office	3.2.2	There must be a description of all the steps that take place from harvest to final sales, incl. which entity who is responsible for the product at each stage.	B	→ check ICS manual or project descriptions submitted to certifier	Information must be available; if necessary, the inspector can assist the ICS Operator by collecting this information for the project in the inspection report. “Responsibility aspect” particularly important if there are contracted processors, warehouses, etc. in the product flow
2.Preparation of inspection /ICS office	4.1.1	A detailed initial risk assessment has to be done at the beginning of certification (first year of certification or when informed about this requirement by certifier). This risk assessment has to identify risks at the farm level as well as during buying, processing, or (export) transport, while the product is under the responsibility of the ICS Operator.	B	→ check risk assessment in ICS manual. If not available, ask ICS manager about such an assessment. <i>If no written assessment available</i> → interview ICS manager to find out about his risk awareness	Operator needs to be aware of potential risks that could threaten the organic quality of the product, at the very least orally. Risk assessment can be quite simple in a low risk situation, but should be more refined in a high risk setting with conventional farm practices in the relevant area/crop. If not all risks are yet fully known the risk assessment can be finalized during/after inspection.
2.Preparation of inspection/IC S office	5.2.1	There is an ICS manual, i.e., a set of documented policies, procedures, and forms for the internal control measures.	B	→ Read ICS manual	Often this is not yet a “manual” but a set of forms and possibly procedures. If procedures are not written down, it must be checked whether they are at least known to all staff concerned (in this case: partly fulfilled). If there are only forms but no defined procedures at all this requirement is not fulfilled
2.Preparation of inspection/IC S office	5.2.2	The ICS manual covers, in principle, all relevant procedures (and their documentation): internal organic standard (farm production rules), farm registration, internal inspection, internal approval/sanctions, selling/buying, product handling.	B	→ Read and evaluate ICS manual and take notes on which parts are completely missing. These parts must be checked in even more detail during inspection to find out whether there is no standard procedure at all or only no written procedure.	Some procedures and forms MUST be present (category A), some other can be added → see the compliance criteria in respective chapters
2.Preparation of inspection/IC S office	5.3.1	There is a documented internal organic standard	B	→ check ICS manual and related docs (contract) for the applicable organic production rules.	A primary and simple “internal standard” is often the production rules as listed in the project’s growers contracts. In certain cases the external certification standard can be accepted as basis for internal inspections and approval, but usually a local interpretation in clear words must be available

WHERE	Chapter in report	Compliance Criteria	How to check	Comments for the inspector
2.Preparation for inspection/ICS office	5.3.2	The internal organic standard regulates the following aspects sufficiently (with regard to requirements of certification standard): - production unit/part conversion - soil management & fertilization (incl. inputs) - plant protection (incl. inputs) - seeds and planting stock - prevention of drift and contamination - post harvest handling & storage - livestock husbandry - conversion period	B → evaluate the relevant documents • Are at least the minimum requirements of all applicable organic certification standards included, as far as they are relevant for the local farming situation? (there will be often several certification standards)	“internal organic standard” can be scattered; e.g., the production rules in the contract and some parts in ICS manual (e.g., conversion rules included in the procedure to register new farmers, etc., and not in the contract). Often there are also additional “technical guidelines” for farmers and/or field officers. “as far as relevant”: all listed issues must be covered (even if at present, e.g., seeds are no issue). But some parts of the standard still may not be relevant (e.g., rule related to conventional farm unit, full list of prohibited inputs if ICS decided to permit only a few inputs)
3.ICS office/Re-inspections	4.1.2	The ICS takes all measures to minimize the identified risks.	B • Are potential risks tackled sufficiently in the checklists, internal trainings etc.? • Is staff aware of the risks and knows what can be done to avoid the risk?	Identified relevant risks: risks as identified by ICS and additional risks that have been identified by external inspector
3.Office visit / Re-inspection	4.3.4	If farms (bigger than “smallholders”) are certified as part of an smallholder group certification project, the following additional criteria apply: • Every farm is inspected annually by both the ICS and the certification body. • Each farm has to keep most relevant farm documentation itself • Common marketing under responsibility of ICS Operator (no marketing oneself)	B → screen farmers list for “bigger farms” – checked named requirements with ICS staff → select such bigger farms for re-inspection → determine whether they are “bigger farms” → if check/ensure that they comply with the requirements.	Basically the certification requirements for a farm that is certified as part of a bigger smallholder project are the same as for any farm with own certification. It may be acceptable that the ICS assists the farm in keeping the relevant documentation; at least a farm diary and a map will be required. The bigger and more complex the farm activities, the stricter the inspection requirements and time needed for inspection of that farm.
3.ICS office	5.1.1	The ICS Operator has an organizational chart or table of responsibilities.	B Is there an organizational chart / table of responsibilities	In ICS manual or as separate document?
3.ICS office	5.1.2	There is a clearly defined person in charge of coordinating the ICS and interacting/coordinating with the organic certification body.	A • Is there an ICS Coordinator, ISA Manager, Organic Program Manager, or similar?	This is usually the ICS Coordinator or ICS Manager or “Organic Manager” or “ICS Supervisor” (or similar). For bigger groups this should not be the internal inspector.
3.ICS office	5.1.3	At least one person has been assigned by the ICS to make approval & sanction decisions.	B • Who is in charge of approval & sanction decisions?	Often this is the ICS Coordinator but could be another qualified person or an approval committee. In principle this shall be a person other than the internal inspector (for a particular farmer). It would be advisable that sanction decisions are at least discussed in a small group, e.g., with field officers, before taking the decision.
3.ICS office/ Witness audits	5.2.3	Internal ICS staff has up-to-date forms at hand and is aware of the valid ICS procedures as described in manual	C → Ask staff for their ICS manual → are the forms/policies used by internal inspectors those in the manual?	Does ICS staff have the relevant parts of the ICS manual at hand? Are they familiar with the forms and procedures?

WHERE	Chapter in report	Compliance Criteria		How to check	Comments for the inspector
3.ICS office	5.2.4	The ICS manual is reviewed on a regular basis and updated when necessary	B	<ul style="list-style-type: none"> When was last update? Was the manual changed if there were changes in standards, problems with old manual, or conditions of certifiers? Is there a system to manage the versions? 	Normally regular would mean once per year, before beginning of new internal inspection season.
3.ICS office	5.1.4	There is a sufficient number of internal inspectors to perform the 100% internal inspection each year.	B	<ul style="list-style-type: none"> → ask for list of internal inspectors → compile approximate overview of the inspectors' other duties to find out how much time is available for internal inspection visits → estimate reasonable average number of farmers that can be inspected per day (incl. report farmers, that farmers sometimes not available, etc.) → check whether sufficient inspectors 	<p>Consider that the internal inspectors often have other duties than internal inspection (field extension, other work for organizations)</p> <p>Normal time for each internal inspection would be 30-120 min per farmer plus travel time from farmer to farmer.</p>
3.ICS office	5.3.3	The internal organic standard is written in a language and manner that is clearly understood by all ICS staff	B	<ul style="list-style-type: none"> → evaluate the version of the organic production rules that is given to the farmers. <ul style="list-style-type: none"> Language of ICS staff? Readable & clear for a typical ICS staff member? 	example included in the contract
3.ICS office	5.3.4	The (summary of) the internal organic standard is presented to the farmers in language and a form that can be understood by the farmers	B	<ul style="list-style-type: none"> Is the "summary" easy and clear to read (adapted to knowledge level of farmers and available in their language)? If farmers are not literate, are the requirements communicated to them sufficiently (training)? 	<p>Sometimes good to summarize the production rules for illiterate farmers in pictures.</p> <p>Depends on the complexity and intensity of production system whether training in all detailed of the internal standard requirements (dos and don'ts) is important or more focus should be given to training in organic farming methods (do's)</p>
3.ICS office	5.3.6	The internal approval staff are familiar with the overall standard requirements of the (external) certification standard	B	<ul style="list-style-type: none"> Check how ICS has sanctioned certain non-conformities Ask approval manager for his reaction to a couple of typical non-conformities that have been found/could be found Does the approval manager have the external organic standards (or a summary thereof) at hand and seem familiar with main requirements? 	The ICS Operator has the certification standard at hand and the people who define the internal organic standard and make approval/sanction decisions are familiar with the basic requirements. It can't be expected that the Approval Manager know every word of complex and detailed organic standards, but they should still have some idea about the requirements and, e.g., know input lists, etc.
3.ICS office	5.4.1	For each farmer to be certified there is a written commitment declaration between the ICS and the farmer. The declaration must contain an obligation to fulfill the organic standard	A	<ul style="list-style-type: none"> → screen farm files for whether there is (at least a simple) contract for each farmer. 	The most important obligations (comply with standard, allow access) could be included in farm registration forms, whereas the formal contracts are sometimes only signed after the conversion period or after first certification. A simplified form of contract or commitment declaration must be available even for conversion farmers.

WHERE	Chapter in report	Compliance Criteria		How to check	Comments for the inspector
3.ICS office	5.4.2	The agreement/contract (or enclosed documents) describes the applicable production standards and allows the inspector to access the farm. It must be clear that noncompliances will be sanctioned. For each farmer there is such signed contract available before buying.	B	→ evaluate the existing contract	Instead of describing the production standard, the contract can also refer to the internal organic standard. In this case the farmers must have received the internal organic standard. The complete contract must be signed before first purchase from a certain farmer. It is enough if the contract states that violations will result in sanctions and may even lead to exclusion or financial penalties (if this is the case); no details needed on which action will result in which sanction.
3.ICS office	5.4.3	For each farmer a basic data form (farm entrance form, basic questionnaire) is available. The form lists the organic crops with their respective area (or e.g., approx. number of trees in case of mixed cropping). The date of last application of prohibited inputs is recorded for all organic plots.	A- B	→ screen farm files whether basic data forms are available for all farmers (spot check)	Screen random farmers files (for each center of the ICS or for different internal inspectors) on whether farm questionnaires are available and complete. In certain cases sufficient details may be given only in inspection checklists.
3.ICS office/ Re-inspection	5.4.4	The basic data form describes the total area under management of the farmer and clearly indicates any conventional fields. The number of animals is registered.	B	→ check basic data format: does it require data on all land managed by farmer (incl. conventional fields)? Check basic description whether farmers HAVE any conventional fields → check during re-inspections whether all fields which you found the farmer to manage have been registered in the respective basic data form.	Registration figures should be reasonably accurate (often even farmers do not know their total area exactly; a reasonable estimate is sufficient).
3.ICS office/ Re-inspections	5.4.5	An overview map (village or community map) shows the location of each farm (all fields) with code numbers for each farmer. The map is dated.	A- B	→ check overview map in the office → check during re-inspections whether map reflects reality	Good overview maps are difficult to draw; nobody will expect a perfect map, but inspector should be at least able to approximately locate the respective farmers and confirm with landmarks/neighbors etc. that the visited farm is the farm indicated on map.
3.ICS office/ Re-inspections	5.4.6	In cases where the registered farms grow (a) rotating annual crops or (b) also some non-organic crops close to the organic fields, a farm map must be available showing at least the fields of each farmer with their respective crops and organic status. The maps are dated and contain sufficient details (land marks, etc.) to identify the location of fields.	B	Assess whether individual farm maps are necessary according to the project description. If yes: → check a couple of sample maps in farm files (office) → assess a few sample field maps during the re-inspections.	Good maps are difficult to find. A simple drawn sketch that somehow represents the field situation can be considered sufficient. If the maps are not to scale it is useful if at least the acreage of each plot is indicated. In some cases good maps with indication of acreage under each crop (and e.g., planting date) can replace a detailed field list in the inspection report/farm registration form. Field maps can be for a single farmer or for neighboring farmers together on one map (as long as single plots can still be seen on map). Organic status must only be indicated if farmer has more than one status (organic & conventional, organic & conversion), etc.

WHERE	Chapter in report	Compliance Criteria		How to check	Comments for the inspector
3.ICS office/ Re-inspections	5.4.7	All important advice given to the farmer is documented.	C	<p>→ Find out how/whether advice is documented (“important advise”, see comments)</p> <p>→ During re-inspection: spot-check particular information on critical farmers, e.g., farmers for whom major problems have been found (by you and/or ICS) - is there any way you can see from the files that this farmer had already been advised several times to improve xxxx?</p>	If a farmer is visited regularly, details on every visit don’t have to be available, but, e.g., if the field officer has given instructions to farmer to use this or that (allowed) external input as an exception, this should be recorded. Or important corrective actions required from the farmer during extension visits. Or problems found during extension visits (→ see chapter sanctions). Often advice to farmers is registered in field officers books. This is sufficient, but not easy to screen in order to see advice for a certain farmer. Might be better if advice is recorded in farmers’ diaries directly.
3.ICS office	5.4.8	For each farmer, the following minimum information on farming activities is available: use of inputs (with quantities, incl. homemade applications or seeds), harvested quantities, new fields/change in area (if so: last use of prohibited inputs), or crops	B	→ evaluate internal inspection report form and/or additional annual update data forms (if any)	This information is often recorded annually in the internal inspection checklist. This is sufficient for simple “traditional” farming systems, e.g., with almost no use of external inputs. If the farming system is more complex, the field officers or the farmers themselves should register the information more systematically, e.g., in updated farm questionnaires or simple activity reports for the farmers. Sometimes it may be useful to hand small farm diaries to the farmers, in which both the farmer and the field officer records the most important activities and advice. The simpler the farm activities and the lower the overall risk, the simpler the documentation kept on farm level can be.
3.ICS office	5.4.9	The internal farm inspection report (checklist) covers all relevant certification aspects (organic production for whole farm or separation of organic & conventional farm unit, use of inputs, fertilization and soil management practices, plant protection measures, use of seeds, separation & prevention of contamination during harvest and any post harvest handling, sustainable animal husbandry). The checklist includes an evaluation of the compliance of the farmer with the internal organic standard as well as necessary corrective measures/conditions or recommendations.	B	<p>→ evaluate internal inspection report format</p> <p>→ check a few samples in farm files whether the respective chapters are being filled in effectively.</p>	Note: if the ICS has no update questionnaires or activities reports for a farmer, all the information as written in the previous requirement must be included in the internal checklist. Changes in fields/area are particularly important. The internal inspection report must cover all crops in the organic unit (e.g., usually all crops grown by the farmer).
3.ICS office	5.4.10	All registered farmers are listed in a farmers list, which contains at least the following information: village/location, farmers name, farmers code, area under organic cash crop (or number of trees, etc.), internal approval status (organic, conversion year XX; from second year onwards.)	A	→ Check up to date farmers list: is all required information included? If not, can it be completed from documentation or is an additional round of data collection visits necessary)	The list must be up to date and the project shall demonstrate that it can process information about its members efficiently and correctly. Check whether all ICS staff knows which farmers list is up to date, which list is valid for purchase, etc. Cross-check between farmers list and individual inspection reports during the re-inspection.

WHERE	Chapter in report	Compliance Criteria		How to check	Comments for the inspector
3.ICS office	5.4.11	As a summary of the internal inspections the following information must be available per farmer and needs to be included in the farmers list: total area, date of registration, date of last use of prohibited inputs, name internal inspector, date internal inspection, yield estimate	B-C	<p>→ check farmers list whether the mentioned data is also (already) included</p> <p>→ cross-check this information with farm files</p>	The aforementioned information shall also be included in the farmers list; however, the certifier may accept for these details to be included only within a period of 1-2 years or in a separate list. Some information (e.g., yield estimates) is a minimum requirement for some certifiers.
3.ICS office	5.4.12	Sanctioned farmer and farmers that have left the farmer group are recorded on a separate farmers list. The reasons for and duration of the sanction (or reasons for leaving the group) are recorded.	B	→ ask for a list of sanctioned farmers (and farmers who have left the project) – if not available, check whether the ICS would be able to produce such a list from their own recording system or whether information on sanctioned/withdrawing farmers was lost.	Number farmers last year minus sanctioned/withdrawing farmers plus new farmers = number farmers present year.
3.ICS office	5.4.13	All documents of the ICS are kept for at least 5 years and are available for external inspection at any time.	B	<ul style="list-style-type: none"> For older organic operators, ask to see the documents of previous years. 	
3.ICS office	5.5.1	100% of the registered growers are formally inspected each year by the ICS.	A	<p>→ check summary of internal inspection (farmers list with date of internal inspection)</p> <p>→ screen files with internal inspection reports whether you can find an inspection report for each farmer (random spot check)</p>	Every farmer to be certified (organic, conversion, passive) is inspected at least once a year (internal control year can be different from calendar year) by the internal control. For annual crops, the inspection takes place once in each growing season. If internal inspection is not yet finalized at time of external inspection, do they have the capacity and procedures to ensure that they will inspect 100%? (will need to submit farmers list with dates of planned internal inspection)
3.ICS office	5.5.11	Yield estimates are ready before harvest.	B-C	<p>→ evaluate purchase procedures in ICS manual</p> <ul style="list-style-type: none"> ask ICS manager when estimates will be ready and they are communicated to purchase responsible and used during purchase 	
3.ICS office/ Re-inspections	5.5.6	The ICS has ensured that any necessary corrective measures have been communicated (during or shortly after farm inspection) to the farmer. ICS has followed up to ensure that the measures were implemented	B	<ul style="list-style-type: none"> What is done in case of minor noncompliances – is a corrective measure written in internal inspection report? How are major sanctions or corrective measures communicated to the farmers (if relevant see evidence of letters to farmer, etc.)? How is ICS following up on necessary corrective measures – are, e.g., field officers informed and in charge of following up? 	Focus on actual violations of standard; sometimes internal conditions and sanctions are rather recommendations to improve production methods (should prune in May, not June) or “internal” concerns, like whether farm has attended the meeting or not, whether farmer has sold also to other traders, etc.
3.ICS office/ Re-inspections	5.5.7	The results of the internal inspection are accurately documented in the internal inspection report and the report has been signed by the internal inspector.	A	<p>→ Screen farm files (folders with internal inspection reports) in the office: have forms been filled in completely and signed?</p> <p>→ Check in detail during re-inspection how well internal inspection report is filled and describes critical issues (if any)</p>	Screen several checklists (of re-inspected farmers and other farmers), at least a couple of checklists per internal inspector. Are they completed consistently and clearly? If a few signatures on reports are missing, but there is evidence that was just a single case problem, this is still ok.

WHERE	Chapter in report	Compliance Criteria		How to check	Comments for the inspector
3.ICS office	5.5.8	The results of the internal control are confirmed by the farmer by signature (or similar)	B	→ screen internal inspection reports – have all been signed/approved by farmer?	Are the internal checklists signed or otherwise approved by the farmer (fingerprint, oral clear confirmation of farmer that he knew about the results)
3.ICS office	5.5.9	There is a system to estimate yields and record these estimates for each farmer	B- C	→ see respective chapter in ICS manual <ul style="list-style-type: none"> if not available, ask ICS manager/field officers for their rules of thumb and considerations to come up with harvest estimation when and by whom are harvest estimations recorded ? 	<i>(whether it is B or C to have yield estimates available depends on certifier's overall policy)</i> . Usually estimation of yields is done during internal inspections and recorded in internal checklists, but sometimes estimates are prepared (or at least updated) by field officers just before harvest and summarized in buying lists.
3. ICS office	5.5.12	If any noncompliances are found at random times (not at internal inspection) this is also duly documented.	B	→ Investigate identified non-conformities → where they found during internal inspection or at a random time? → If they were found outside the internal inspections, how have the findings and corrective measures/sanctions been documented?	Often non-conformities are in fact found during extension visits, detected by fellow farmers, etc. In this case the ICS should also record the situation in detail (e.g., in separate nonconformity report or similar) and normal sanction procedures should apply.
3.ICS office	5.6.1	There are policies and procedures in place to approve or reject (sanction) farmers	A- B	→ check ICS manual; ask ICS manager about approval policy (what nonconformity results in what kind of sanction) → check whether there is some kind of APPROVAL procedure after the actual inspection (e.g. ICS Manager “approves” the inspected farmers on the farmers list, or total list after inspection is approved by approval committee)	The project has to have procedures in place to screen inspection reports and make decisions on whether the farmer can be approved, i.e., proposed for certification or not. In many cases there are only procedures for the critical cases (sanctions) but is important that the project also make the “positive” approval decisions and be at all times aware of who is internally approved (and who is not).
3.ICS office	5.6.2	From second certification onwards: The ICS sets the conversion status of each farmer as described in the ICS manual and according to the rules agreed upon with the certifier and in consideration of previous certification decisions by the certifier.	B	→ check summary of internal inspection (farmers list) – is conversion status included? → cross-check with last year's certified farmers list. Has the conversion status been set correctly? → have new farmers been registered in conversion and/or according to the rules agreed with the certifier? → always also cross-check the total numbers (organic, conversion year 1/2/3, out/sanctioned), etc., with last year's figures → have all of the certifier's corrections regarding conversion status (i.e., conversion status set by certifier was different from status proposed by ICS during last certification) been duly considered in setting the conversion status of the current year?	Only relevant from 2 nd certification onwards.

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3.ICS office	5.6.3	From second certification onwards: the farmers lists reflect the internal approval status for each farmer (i.e., differentiating between those that are approved organic, conversion, passive, suspended)	A	<p>→ check farmers lists → is there a list of sanctioned farmers / can sanctioned farmers be clearly identified on the list?</p> <p>→ is the result of internal inspection clear in the lists (e.g., by an “OK” in respective column and separate parts of list for organic/conversion/sanctioned farmers)</p>	<p>Usually farmers lists can be considered as summaries of the internal control. The ICS has to demonstrate it can manage its approvals and disapprovals well; i.e., it must know at any time which farmers are approved / disapproved (or in the project at all). This is demonstrated by a complete farmers list that contains all farmers who have been internally approved (are ok) and no more or less.</p> <p>Usually there should be a separate list for all sanctioned farmers → see documentation</p>
3.ICS office/ Re-inspection	5.6.4	If minor or medium non-compliances have been identified by the ICS, appropriate measures have been taken to correct them	B	<p>→ Ask for main problems (minor & medium) during last year and how problems were corrected / farmers “punished”</p> <p>→ Check sanction policy in manual</p> <p>→ If any problems have been found, have they resulted in an immediate sanction and/or corrective measure?</p>	<p>Check during sample inspections whether any medium-level noncompliances have been found and follow up on what conditions/corrective measures have been proposed by the inspector. What was the outcome of the approval decision? Has the farmer been informed of necessary corrective measures? Note: sometimes the ICS may consider an aspect a medium noncompliance that is included in internal organic standard (or nowhere at all), but which does not affect the organic certification (e.g., farmer has not attended group meetings, has sold crops to a local trader, etc.). The reaction to this is also interesting but the main focus should be on “organic noncompliances”.</p>
3.ICS office/ Re-inspections	5.6.5	If major non-compliances have been identified by the ICS, appropriate corrective measures & sanctions have been implemented	A	<p>→ Ask for list of identified problems and how they were sanctioned</p> <p>→ Check sanction policy in manual</p> <p>→ If any problems have been found, have they resulted in an immediate sanction and/or corrective measure?</p> <p>(try to re-inspect at least 1 farmer who deviated and is still in the organic program)</p>	<p>Major noncompliances: all that lead to de-certification of farmer (e.g., use of prohibited inputs on organic fields, fraud at any time, etc.) or products (e.g., parallel production, commingling). They can have been during internal inspections or during extension visits, during spot-checking purchases, etc.</p> <p>Appropriate measures include: full investigation, timely de-certification decisions, implementation of the decisions (changing farmers list, informing buying staff, etc.)</p>
3.ICS office	5.6.6	If any organic produce that had already been bought as organic had to be de-certified, the ICS has followed up the product and taken appropriate corrective measures	A	<p>- check when the specific non-conformity was found and whether at that time products from this farmer were already bought? If yes, check what was done about it</p>	<p>In such a case the ICS should get in contact with the certifier and clarify the situation. Products suspected to not comply with the organic standard must be kept separate until full clarification and decisions on whether the product (mixed lot) really has to be decertified.</p>
3.ICS office	5.7.3	Each internal inspector receives at least one training per year. The participation and content of the training is documented	C	<p>→ ask for trainings for internal inspectors</p> <p>→ check staff documentation of the inspectors for confirmations of training</p>	<p>Training can be documented per training (list of participants per training), but are better (also) documented in the staff file of each internal inspector.</p>

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3.ICS office	5.7.4	The ICS holds a conflict of interest declaration for each internal inspector and each member of the approval staff	C	<p>→ check whether a conflict of interest form is available</p> <p>→ check whether a signed form is available for all inspectors & approval staff</p>	Conflict of interest declaration form states all potential conflicts of interests which could jeopardize the objectivity of their inspection/decision, e.g., family relations or direct business links to certified farmers
3.ICS office/ Re-inspections	5.7.5	Conflicts of interests should have been sufficiently avoided. No inspector or approval staff has inspected/approved his/her own farm or the farms of his/her immediate neighbors, close friends, or family	B	<p>Look for potential conflicts of interests during the whole inspection, e.g., by</p> <ul style="list-style-type: none"> • asking internal inspector about their home village. If they inspect their home village you will need to be alert and ask more specifically whether any of his/her friends or relatives are in the organic project, etc. • asking a few farmers whether they are related to their internal inspector / close friends 	Advice/inspection is not per se a conflict of interest, but check whether the extensionists are somewhat too involved with the farmers to be good/strict inspectors and whether they can really do a thorough and complete inspection without too much “I know already everything about this farmer, so need to ask all this”
3.ICS office/Re-inspections	5.7.6	If there have been conflicts of interest, the ICS must be able to show that no farmer has been given an unfair assessment or been disadvantaged by the internal inspector or by the internal process	A	<p>If you have identified major conflicts of interests</p> <p>→ re-inspect those farmers (or screen their approval decision in detail) and compare your findings with findings of inspector/approval person.</p> <p>→ are there any indications of actual unfair treatment → if not, then the criterion is “OK”.</p>	
3.ICS office/Re-inspections	5.8.1	Each farmer has received at least an initial advisory visit or an initial training course on organic farming	C	<ul style="list-style-type: none"> • Ask for farmers training programs and overview of conducted trainings or field training / field extension system • Spot-check participants’ records on whether they show training for each farmer • Ask farmers during re-inspections about the trainings they have received. 	For certified operators who did not do any training beforehand, it depends on the farmer’s knowledge whether such a training still needs to be done. Can be training or field extension.
3.ICS office	5.8.2	The participation and content of training is documented	C	<ul style="list-style-type: none"> • Does the ICS office get additional information from staff files and interviews with the inspectors about their education and training. Do they keep programs and participant lists for training? • If there is a field extension system: do they have an overview to confirm that each farmer has received a field training visit? 	
3.ICS office/ Buying center	7.1.10	If in-conversion products are bought by the ICS for sale as “organic in conversion” then these products must be kept separate from all organic and non-organic (conventional) products at all times	A	Check with ICS coordinator whether any conversion product is intended for sale as “organic in conversion” → if not → “not applicable”	Usually conversion products not bought, or marketed as conventional.
4.Re-inspections/ Witness audits	5.3.5	All ICS staff is trained, knowledgeable, and competent in the implementation of the internal organic standard and the internal approval requirements	B	<ul style="list-style-type: none"> • Ask field officers / internal inspectors to summarize the organic production rules? • Ask field officers / internal inspectors whether certain practices (conventional tomato field, treated maize seeds in coffee plot, etc.) would be permitted, etc. 	ICS staff familiar with certification requirements as far as relevant for the project (whether written internal organic standard already available or not)

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4.Re-inspections	5.5.10	Yield estimates are trustworthy	B-C	<ul style="list-style-type: none"> → compare their average yield estimates with reference yield estimates for the respective climate → compare your own yield estimates with those prepared by ICS – are they more or less realistic? → are the ICS’s estimates more or less consistent (between different field officers: did they calculate the yields per ac on similar farms in the same way?) 	It is very difficult to make good estimates. However, the higher the risk that farmers try to sell conventional cross as their own, the better the yield estimates should be in order to ensure a good product flow control.
4.Re-inspections/ Witness audits	5.5.2	The overall findings of the external inspection confirm that physical internal farm inspection visits have actually taken place	A	<ul style="list-style-type: none"> • can farmer can remember that he has been inspected and walked with inspector over the fields? • Is internal inspector familiar with farm and the farmer? 	In some cases farm reports are available, but in fact they are not based on actual field visits or even farmers interviews. Thus the inspector must countercheck whether field visits are actually done or not.
4.Re-inspections/ Witness audits	5.5.3	The internal inspection includes a visit to the fields of the farmer as well as an interview with the farmer or his representative.	A	<ul style="list-style-type: none"> • ask farmer what the inspector does when he comes on inspection? • ask inspector what he does if he/she comes for inspection and farmer is not there? <p>→ witness internal inspector’s standard inspection procedures</p>	In exceptional (=very few cases) cases it might be acceptable that in spite of proven efforts no interview with farmer could be conducted in addition to field visits, but a) at least a field officer has conducted an interview with farmer and b) additional information is collected, e.g., from neighbor.
4.Re-Inspections/ Witness audits	5.5.4	The internal farm inspection includes a check of storage areas for inputs and final products as well as inspection of post-harvest handling facilities (if there are any)	B	<p>→ check the respective chapters in the internal inspection report / how they are filled in</p> <p>→ in witness audit see whether/how inspector covers the respective parts of the inspection – checked sufficiently with regard to relevant critical control points?</p> <ul style="list-style-type: none"> • Are internal inspections also done during time of on-farm processing? 	Have your own list of relevant critical control points in mind: for example: storage of prohibited fertilizers from previous fertilizer promotion programs? Storage pest control? Commingling during drying when drying products together with his neighbor or brother, who is not in the organic project, etc.
4.Re-Inspections/ Witness audits	5.5.5	The internal inspections are thorough. All non-compliances with the internal organic standard have been duly identified.	A	<p>→ if you find any critical issues/nonconformities during re-inspection→ check in respective internal inspection report (and possibly other documents) whether same problem was found</p> <ul style="list-style-type: none"> • Is a typical internal control long enough to do a thorough check? (ask how many farmers are inspected per day, how long inspection takes) 	If the inspector’s results differ considerably from those of the internal control, this must be investigated and described in detail in the inspection report. If major or minor noncompliances have not been identified by the ICS → refer to inspection procedures for further details. “long enough”: average complete internal inspection (depending on complexity etc.) should take between 40-90 min.
4.Re-inspections/ Witness audits	5.7.2	The internal inspectors are sufficiently qualified to perform a thorough and objective inspection.	B	<p>→ test the internal inspector’s knowledge of internal organic standard, of organic production methods as well as inspection detection methods.</p> <p>→ the qualifications of the internal inspectors can be assessed from witness audits as well as the quality of internal inspection documents.</p> <p>→ ask inspectors about training received</p> <p>→ check also staff files on training</p>	“sufficiently qualified” also depends on the complexity of production and hence of internal inspection. They must be sufficiently qualified for a thorough internal inspection, i.e., normally if inspectors’ findings have been more or less like ICS’s findings, they have been “sufficiently qualified”

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4.Re-inspections	5.8.3	Farmers are aware of the certification requirements (internal organic standard)	B	<ul style="list-style-type: none"> • Test the farmer’s knowledge of his obligations as organic farmer – is he aware of the DOs and DON’Ts of the internal organic standard? 	
4.Re-inspections	5.8.4	Farmers are familiar with appropriate organic farming methods.	C	<ul style="list-style-type: none"> • Test farmers knowledge of organic farming • Assess the applied organic farming methods 	
4. Re-inspections		<p><i>REMINDER OF WHAT also NEEDS TO BE CHECKED DURING RE-inspections:</i></p> <p>4.3.4 big farms 4.1.2 risk awareness 5.6.3: staff competent in int. org. standard 5.5.6: corrective measures communicated 5.6.7 minor/medium non-conf → appr. measures 5.6.8 major non-conf. → appr. measures 5.4.4 basic data form covers all land 5.4.5&6: overview maps, farm maps 5.4.7 imp. advice documented 5.7.5&6 conflicts of interest 5.8.1: training of farmers 7.1.6. receipts for farmers</p>		<ul style="list-style-type: none"> • 	
5. Witness audits		<p><i>REMINDER OF WHAT also NEEDS TO BE CHECKED DURING WITNESS AUDITS</i></p> <p>5.1.3 familiar with ICS docs as in manual 5.3.5 staff competent in int. org. standard 5.5.2: physical farm inspection takes place 5.5.3: inspection incl. field visit & interview 5.5.4 inspection include storage & handling 5.5.5 inspections are thorough /non-conf. found</p>		<ul style="list-style-type: none"> • 	
6.Buying center	7.1.1	The organic status of the farmer is checked at delivery/purchase points. Only the organic product of certified organic farmers is purchased as “organic product”.	A	<ul style="list-style-type: none"> • Check buying procedures in ICS manual • Ask person responsible for purchase how organic purchase is organized – is there a check of whether farmer is organic or not? • Ask buying officer what he/she considers to be an organic product (e.g., ask whether the product from a certain farmer who is no more in the project an “organic product”?) 	The rules for buying obviously apply to the party that buys from the farmer; usually this is the ICS Operator, but there may be exceptions.
6.Buying center	7.1.2	The verification of the organic status is done on the basis of the certified farmers list (approved farmers list, confirmed by certifier)	A	<ul style="list-style-type: none"> • Ask buying officer, how he/she knows which farmer is organic? • Does buying officer have certified farmers list (or special buying lists) at hand? 	Either purchase officers receive the certified farmers lists (list as confirmed by certifier, appendix to certificate), or special buying lists are prepared by ICS on basis of the certified farmers lists (but with updated harvest estimates).

WHERE	Chapter in report	Compliance Criteria		How to check	Comments for the inspector
6.Buying center	7.1.4	The amount of product supplied is counterchecked with the estimated yield. In cases of doubt, the product is kept separate until clarification is made.	A-B	<ul style="list-style-type: none"> Ask buying officer about exact procedure during buying: are estimated yields compared with quantity delivered? How “secure” is the system, e.g., are delivered quantities continuously summed up to determine immediately if a farmer delivers more than estimated? Can farmers sell to different buying centers and thus possibly supply double quantities? 	This is an important tool to ensure that farmers do not sell their neighbors produce, etc. Also many certifiers actually certify quantities, so if all farmers produce considerably (more than 10%) more than estimated, the certifier should be notified.
6.Buying center	7.1.5	Deliveries/purchases are registered in a buying record, which states at least the date, the farmer’s code, delivered quantity (& product), and the organic quality.	A	→ check buying records (buying book, buying lists, buying ledger or similar)	If there is a lot number system, there must be a linkage between the buying record and corresponding lots
6.Buying center/Re-inspections	7.1.6	The farmer is issued a receipt, which states the farmer’s name (or code), delivered quantities and organic quality	B	→ ask to see copies of receipts issued to farmers (either in continuous chronological receipt books or already sorted per farmer) → during re-inspection ask a few farmer to show some receipts → take notes and cross-check during buying inspection.	The receipt is a tool to cross-check the quantities in the buying record with what the farmers have actually delivered.
6.Buying center	7.1.7	Buying personnel are trained, knowledgeable, and competent in implementing the organic purchasing rules (as outlined in manual)	B	<ul style="list-style-type: none"> Are personnel competent and up to date with regard to procedures and documentation as described in the ICS manual Are buying records kept well (and buying staff understands the recording system) Do purchasing officers show competence/experience in critical issues like separation/prevention of contamination? 	Ask them about the procedures: what they would do in this and that case (e.g., a farmer comes who they have never seen before, farmer wants to sell double the estimated amount)
6.Buying center	7.1.8	There is no conflict of interest between organic product flow control and the income of the buying officer	B	<ul style="list-style-type: none"> What is the relationship between ICS operator and buying staff (employed? contracted? independent “buying agents”?) How are buying officers being remunerated (e.g., depending on quantity bought or per day?) How are farmers paid (cash by buying officers or per check or after harvest)? → If there is a potential risk – assess integrity of purchasing staff.	Sometimes buying personnel have a very strong incentive to buy from non-organic farmers. E.g., keep organic premium for themselves and pay only conventional price to non-organic farmers, or buying officers are paid depending on the quantity of fresh fruits they manage to buy within one day, etc. The Internal Control System has to ensure the integrity of buying procedures keeping in mind that there is a certain conflict between honest buying procedures and income.

WHERE	Chapter in report	Compliance Criteria		How to check	Comments for the inspector
6.Buying center/ Warehouses	7.1.9	The organic product is kept separate from any product in conversion and non-organic product at all times. The separation system must be clear and documented	A	<ul style="list-style-type: none"> Physically check buying center – check specific areas for storage (even intermediate storage) of the organic products Ask staff in detail about how they actually handle the organic product (after reception, etc.) Test if all personnel understand the system – what would happen, e.g., if chief buying officer is sick? – would anybody know which is the organic product? Test their awareness of critical issues by asking them what they would do in an exceptional situation (see comments) 	<p>Handling includes ALL steps from reception of the product to delivery to next entity (e.g., delivery to central warehouse or processing unit): usually this includes some sorting/grading, intermediate storage, re-packing into bags of the farmers group, etc.</p> <p>Example of an “exceptional situation”: more farmers deliver a certain day than they can possibly grade the same day, and next day there is also conventional buying in the center</p>
6.Buying center/ Warehouses	7.1.11	During storage and transport the organic products must be labeled at all times as “organic”.	B	<ul style="list-style-type: none"> Physical check of buying center/warehouses – are the bags/containers with organic produce labeled? 	<p>Only applicable for all steps from buying/collection onwards (not from farm to buying center). Appropriate labeling, no loose paper sheets lying on open bags. In some cases a very clear color coding system may also be accepted (e.g., green bags for organic coffee, brown bags for non-organic coffee. Also acceptable: organic quality is indicated on accompanying documents (e.g., bin card) if 100% correlation to the products is possible (e.g., via lot number)</p>
6.Buying center/ Warehouses	7.1.13	Storage areas must be labeled as “organic”. If non-organic and organic produce are stored unsealed in the same room, there has to be a clearly defined and well-labeled, physically separated section of the room allocated to the organic produce.	A-B	<ul style="list-style-type: none"> Physical check of buying center intermediate storage rooms and warehouses– check specific areas for storage of the organic products 	<p>Unsealed bags/loose products: Physical separation— wall, at least 3 m separation, separate (big) containers. If bags are sealed: clear storage area that prevents accidental commingling of the produce.</p>
6.Buying center/ Warehouses	7.1.16	Facility pest management is according to the applicable standard. The organic product is not contaminated.	A	→ verify records on facility pest management in warehouse	Warehouses often have companies contracted for pest control – there should be records available on any pest control measures in the warehouse (even at port)
7.Warehouse	7.1.12	For transport to another unit the following additional information is stated on label/accompanying papers: name of owner of product, “certified by XXX”, and lot number (if applicable)		<ul style="list-style-type: none"> Physical check of buying center/warehouses – are the bags/containers with the organic produce labeled? 	
7.Warehouses	7.1.14	Warehouse personnel are trained, knowledgeable, and competent in implementing the organic storage rules.		<ul style="list-style-type: none"> Are personnel competent and up to date with regard to procedures and documentation as described in the ICS manual? Are stock records kept well (and warehouse staff understands the recording system)? <p>Do those responsible for the warehouse show competence/experience in critical issues like separation/prevention of contamination?</p>	Ask how they handle organic products, how they do warehouse fumigation (if there is any), etc.

WHERE	Chapter in report	Compliance Criteria		How to check	Comments for the inspector
7.Warehouses / Export	7.1.15	There is no fumigation, irradiation/ionization at any stage of the product flow	A	→ understand all steps under responsibility of ICS managers – is there any risk that the product can be fumigated/irradiated (e.g. in the part before shipment)? → Also verify pest facility management records of warehouses	If there is fumigation of warehouses (or containers), the organic product may not be IN the warehouse and appropriate waiting times must be respected before the organic product is re-entered. Product must not be contaminated
7.Warehouse		<i>Reminder what also needs to be checked during warehouse inspection: 7.1.9 separation 7.1.11 labeled as organic 7.1.13 storage area labeled as organic 7.1.16 facility pest management</i>			
7.Processing unit	7.1.17	All central processing units where organic products are processed are subject to full processor inspection& certification by the organic certification body.	A	→ make sure to inspect all central processing units as “processors” and reference these inspections in report 2.2. (overview of inspection)	All processing by the farmers BEFORE purchase is usually considered “post-harvest treatment” and checked by the ICS at the farm level.
8.Final evaluation	5.1.5	The ICS procedures and policies (with related forms) are implemented essentially as outlined in the ICS manual.	B		It is important that the manual reflects the actual internal procedures; otherwise the manual is a very poor basis for evaluation of the ICS and not very useful for the ICS staff either.
8.Final Evaluation	5.7.1	Staff are aware of their duties and responsibilities	B	• Internal inspector, field officers, ICS manager, purchase officers, etc., are aware of their duties within the ICS system	
8.Final evaluation	7.1.3	There is demonstrated evidence that farmers only sell products from their own certified land	A	Overall assessment based on re- inspections (info from farmers), information from neighbors, evaluation of buying system, social control/sense of responsibility amongst farmers, incentives, etc.	This aspect is particularly relevant if the yield estimates are poor! The criterion is “OK” if the overall critical assessment has not given rise to any confirmed doubts that farmers sell products other than their own.

Compliance criteria for farm production & processing are listed as an example in the ICS report (chapter 6, 7 & 8) but not in this document, since they are highly dependent on standard and certifier.

C. INSPECTION REPORT (SAMPLE THAT INSPECTORS CAN USE)

SMALLHOLDER GROWERS GROUP WITH ICS

Report No.: _____

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1 Project

<i>Operation (Smallholder Group) Name</i>	<i>Mandator/Commissioner</i>
<i>Operator's Mailing Address</i>	<i>Operator's Physical Address (Village/Town, Country)</i>
<i>Telephone:</i> <i>Fax:</i> <i>Email:</i>	<i>ICS Project Manager:</i>

2 Inspection Details

<i>Inspector</i>		<i>Inspection Date(s)</i>	
	The ICS Manager was present during inspection	Announced visit	Complete first audit
	Exit discussion was concluded	Unannounced visit	Complete update audit
	Risk assessment was done	Visit with focus re-inspections	Spot check
Organic Standards for which certification is requested:			
Products for which certification is requested:			

2.1 Details of Inspection

Summary of instruction for the visit:

Inspection Schedule

Date	Inspection Activity

In the course of the inspection information was obtained from the following sources

<i>Information Source</i>	<i>Details</i>
Interview ICS Manager	
Re-inspection of farmers	→ see 2.2
Witness internal inspections	→ see 2.2
Interview(s) with other ICS staff	
Check of ICS records	
Visit to local pesticide storage areas	
Visit to farmers in neighborhood	
Visit to authorities, NGOs, etc.	
Interview purchase responsible	
Check residue analysis	

Language of inspection (if translation was used, give details)

2.2 Overview of Inspection

<i>Project Site</i>	<i>No. re-inspected growers</i>	<i>Comments</i>

<i>WITNESS AUDITS of internal inspectors</i>		
<i>Project site</i>	<i>Internal inspector</i>	<i>Comments</i>

<i>Inspected purchase centers</i>	<i>Comments</i>

<i>Inspected processing units as part of ICS project</i>	<i>Type of processor</i>		<i>Processed product; reference to separate inspection report for processor</i>
	Contracted processor		
	Own processing		
	Contracted processor		
	Own processing		

Comments:

3 Project Description

3.1 Brief History and Background of Project

3.2 Activities of the Project

Overview of Project Sites

Description of all production & handling steps (until sales)

	Compliance Criteria	Cat.	OK	PF	NF
3.2.1	An overview of the organic operation sites is available, (sites, farming system, agricultural practices)	B			
3.2.2	There is a description of all steps that take place from harvest to final sales, including which entity and who is responsible for the product at each stage.	B			

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

3.3 Basic Information about Production Area

SHORT introduction to geographical location, climatic characteristics of region, typical farming style (including typical products) in the area.

3.4 Typical Farming System of the Registered Growers

If necessary according to project site

3.5 Farmers in the Project

The farmers in the growers group are:

	In villages scattered over the project's area		Villages are closely located to each other/all in same area
	Scattered individual smallholder farms		Clusters of neighboring organic farms
	A couple of farmers are registered per village		Basically all farmers in a village are registered

Total number of farmers:	Organic	
	In conversion	
	Passive/suspended, etc.	

4 Risk Assessment

4.1 Risk Assessment by the ICS

Summary of most important risks identified by the ICS

	Compliance Criteria	Cat.	OK	PF	NF	N/A
4.1.1	A detailed initial risk assessment has to be done by the ICS at the beginning of certification (risks at farm level as well as during buying & handling).	B				
4.1.2	The ICS takes all measures to minimize the identified relevant risks.	B				

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4.2 Risk Assessment by Certification Body for Determination of Re-inspection Rate

(if project sites are very different → separate risk assessments for different project sites)

Potential risk area	Identified major risks (yes/no)		Evaluation of risk and prevention of the risk by project
	Y	N	
Organic crop			Crop is typically grown with chemicals, difficult to grow organically in the area

Potential risk area	Identified major risks (yes/no)		Evaluation of risk and prevention of the risk by project
	Y	N	
Farmers		Farmers not well aware of organic production methods	
		Farmers not really convinced of organic farming	
		Farmers also grow non-organic crops	
ICS & project organization		ICS staff not sufficiently qualified for efficient control	
		ICS does not have sufficient staff or lacks means for effective control	
		ICS staff has changed	
		ICS has failed to detect major non-compliances → <i>results automatically in highest risk category</i>	
		High incentives for farmers to sell products other than their own as organic.	
Other			
Sum of identified risk points:			

Overall Risk Evaluation and Risk Categorization:

	Low risk (1-3 risk)
	Medium high risk (3-5 risks)
	High risk (> 5 risks OR major non-conformities not detected)

Justification:

4.3 Determination of Inspection Procedures

Qualification for Smallholder Group Certification

	Compliance criteria	Cat.	OK	PF	NF	N/A
4.3.1	The requirements for smallholder group certification are fulfilled (smallholders, homogeneity of members/production, marketing as a group)	A				
4.3.2						
4.3.3						
4.3.4	If farms (bigger than “smallholders”) are certified as part of a smallholder group certification project, it has been ensured that: <ul style="list-style-type: none"> • Every farm is inspected annually by both the ICS and the certification body. • Each farm has to keep the most relevant farm documentation itself . • Common marketing is under the responsibility of ICS operator (no farm marketing itself). 	B				

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

Determination of re-inspection rates based on risk assessment

Square root N (or minimum number):	
Risk factor (normal: 1, medium risk : 1.2 high risk: 1.4)	
Resulting minimum re-inspection rate (no. of farmers):	
Effective number of re-inspected farmers	
Effective re-inspection rate in % (No. re-inspected/No. total *100)	
Other comments regarding re-inspection rate/ re-inspection schedule	

5 The Internal Control System

5.1 Structure and Organization of ICS

Brief Description

Name ICS Coordinator	
Name ICS Approval Manager	
Centers of internal control:	
No. of internal inspectors	
No. of field advisors	Are they identical with inspectors?

Evaluation

	Compliance Criteria	Cat.	OK	PF	NF	N/A
5.1.1	The ICS operator has an organizational chart or table of responsibilities.	B				
5.1.2	One person is assigned to coordinate the ICS and interact/coordinate with the certification body.	A				
5.1.3	The ICS has assigned at least one person to make approval & sanction decisions	B				
5.1.4	There is a sufficient number of internal inspectors to perform the 100% internal inspections each year.	B				

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

5.2 ICS Manual

Brief Description of ICS Manual

(what is considered as ICS "Manual", etc.)

	Compliance criteria	Cat.	OK	PF	NF	N/A
5.2.1	There is an ICS manual , i.e. a set of documented forms and procedures of the internal control measures.	B				
5.2.2	The ICS Manual covers , in principle, all relevant procedures (and their documentation): internal organic standard (farm production rules), farm registration, internal inspection, internal approval/sanctions, selling/buying, product handling.	B				
5.2.3	ICS staff has up-to-date forms at hand and is aware of the valid ICS procedures	C				
5.2.4	The ICS Manual is reviewed on a regular basis and updated when necessary	B				
5.2.5	The ICS procedures, policies (with related forms) are implemented essentially as outlined in the ICS Manual	B				

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

5.3 Internal Organic Standard

Evaluation of Internal Organic Standard

	Compliance criteria	Cat.	OK	PF	NF	N/A
5.3.1	There is a documented internal organic standard	B				
5.3.2	The internal organic standard regulates the following aspects sufficiently (with regard to requirements of certification standard):	B				
	- whole farm conversion (if required) or requirements for separation of organic/conventional farm unit					
	- soil management & fertilization (including inputs)					
	- plant protection (including inputs)					
	- seeds and planting stock					
	- prevention of drift and contamination					
	- livestock husbandry (if required by standard)					
	- post-harvest handling & storage					
	- conversion period					

5.3.3	The internal organic standard is written in a language and manner that is clearly understood by all ICS staff .	B				
5.3.4	The (summary of the) internal organic standard is presented in a language/form that it can be understood by farmers .	B				
5.3.5	All ICS staff is trained, knowledgeable, and competent in the implementation of the internal organic standard and the internal approval requirements.	B				
5.3.6	The internal approval staff is familiar with the overall standard requirements of the (external certification standard).	B				

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

5.4 ICS Documentation

Brief Description of Documentation System

Evaluation

	Compliance criteria	Cat.	OK	PF	NF	N/A
5.4.1	For each farmer to be certified there is a written commitment declaration between the ICS and the farmer. The declaration must contain an obligation to meet the organic standard.	A				
5.4.2	The agreement/contract (or enclosed documents) describes the applicable production standards and allows the inspector access to the farm. It must be clear that non-compliances will be sanctioned. For each farmer there is such signed contract available before buying.	B				
5.4.3	For each farmer to be certified, a basic data form (farm entrance form, basic questionnaire) is available . The date of last application of prohibited inputs is recorded for all organic plots.	A-B				
5.4.4	The basic data form describes the total area under management of the farmer (including conventional fields) and lists the organic crops with their respective areas (or, e.g., approx. no. of trees in case of mixed cropping). The number of animals is registered.	B				
5.4.5	An overview map (village or community map) shows the location of each farm (all fields) with code numbers for each farmer. The map is dated.	A-B				
5.4.6	In cases where the registered farms grow (a) rotating annual crops or (b) also some non-organic crops close to the organic fields, or (c) in areas with high incidence of chemical use, a farm map is available showing at least the fields of each farmer with their respective crops and organic standard. The maps are dated and contain sufficient details (landmarks etc.) to identify the location of fields.	C				
5.4.7	All important advice given to the farmer is documented .	C				
5.4.8	For each farmer the following minimum update information on his farming activities is available: - use of inputs (with quantities, including homemade applications or seeds) - harvested quantities, - new fields/change in area (if so: last use of prohibited inputs) or crops	B				
5.4.9	The internal farm inspection form (checklist) sufficiently covers all relevant certification aspects: - whole farm conversion (if required) or clear separation of organic & conventional farm units - use of inputs, fertilization and soil management practices, plant protection measures - use of seeds - separation & prevention of contamination during harvest and any post-harvest handling, - sustainable animal husbandry (if required by standard) The form includes an evaluation of the compliance of the farmer with the internal standard as well as necessary corrective measures/conditions or recommendations.	B				
5.4.10	All registered farmers are listed in a farmers list , which contains at least the following information: village/location, farmer's name, farmer's code, area under organic cash crop (or number of trees, etc.), internal approval status (organic/conversion year X; <i>from second certification onwards</i> .)	A				
5.4.11	As a summary of the internal inspections the following information must be available for each farmer and should be included in the farmers list : total area, date of registration, date of last use of prohibited inputs, name internal inspector, date internal inspection, internal approval result for farmer, yield estimate	B-C				
5.4.12	Sanctioned farmers and farmers that have left the farmer group are recorded on a separate farmers list . The reasons and duration of the sanction (or reasons for leaving the group) are recorded.	B				
5.4.13	All documents of the ICS are kept for at least 5 years and are available for inspection at any time.	B				
5.4.14	Information on a certain farmer (e.g. area, begin of conversion) is consistent among various ICS documents.	B				

5.5 Internal Inspections

Brief Description of Internal Inspections (frequency, who, average time per inspection)

Evaluation

	Compliance criteria	Cat	OK	PF	NF	N/A
5.5.1	100% of the registered growers are formally inspected each year by the ICS.	A				
5.5.2	Physical internal farm inspection visits have actually taken place	A				
5.5.3	The internal inspection includes a visit to the fields of the farmer as well as an interview with the farmer or the representative.	A				
5.5.4	The internal farm inspection includes a check of storage areas for inputs and final products as well as inspection of post-harvest handling facilities (if there are any)	B				
5.5.5	The internal inspections are thorough. All non-compliances with the internal organic standard have been duly identified .	A				
5.5.6	If necessary, corrective measures have been communicated (during or shortly after farm inspection) to the farmer. ICS has followed up to ensure that the measures were implemented	B				
5.5.7	The results of the internal inspection are documented in the internal inspection report accurately and the report has been signed by the internal inspector .	A				
5.5.8	The internal inspection report is signed by the farmer .	B				
5.5.9	There is a system to estimate yields and record these estimates for each farmer.	B-C				
5.5.10	Yield estimates are trustworthy .	B-C				
5.5.11	Yield estimates are ready before harvest.	B-C				
5.5.12	If any non-conformities are found at other times (not at internal inspection), this is also duly documented .	B				

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

5.6 Internal Approval & Sanctions

Brief Description of Approval System

Overview of non-compliances identified by ICS this year and applied sanctions

Evaluation

	Compliance criteria	Cat	OK	PF	NF	N/A
5.6.1	Policies and procedures in place to approve or reject (sanction) farmers	B				
5.6.2	The ICS sets the exact conversion status of each farmer (from 2 nd certification on)	B				
5.6.3	The farmers list reflects the internal approval status for each farmer, i.e. OK, passive, suspended (from 2 nd certification on)	A				
5.6.4	In case of medium or minor non-compliances , appropriate corrective measures are taken by the ICS	B				
5.6.5	In case of major non-compliances , appropriate corrective measures & sanctions implemented by ICS	A				
5.6.6	If any organic produce that had already been bought as organic had to be de-certified , the ICS has followed up the product and taken appropriate corrective measures.	A				

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

5.7 Qualification of ICS Personnel & Conflicts of Interests

	Compliance criteria	Cat.	OK	PF	NF
5.7.1	Staff is aware of duties and responsibilities .	B-C			
5.7.2	The internal inspectors are sufficiently qualified to perform a thorough and objective inspection.	B			
5.7.3	Each internal inspector receives at least one training (participation & content documented) .	C			
5.7.4	The ICS holds a conflict of interest declaration for each internal inspector and approval staff.	C			
5.7.5	Conflicts of interests should have been sufficiently avoided . No inspector or approval staff has inspected/approved his/her own farm, nor the farm of his/her immediate neighbors, close friends, or family.	B			
5.7.6	If there have been conflicts of interest , it has not resulted in unfair assessment	A			

5.8 Training of Farmers and Farmer's knowledge of Organic Production

Brief description of field extension and/or farmers training activities

Evaluation

	Compliance criteria	Cat.	OK	PF	NF	N/A
5.8.1	Each farmer has received at least one initial advisory visit or initial training course on organic farming.	C				
5.8.2	The participation and content of training is documented .	C				
5.8.3	Farmers are aware of the certification requirements (internal organic standard).	B				
5.8.4	Farmers are familiar with appropriate organic farming methods .	C				

6 Farm Production

6.1 Farm Unit and Part Conversion

Description	yes	no	Comments
ICS operator requires whole farm conversion (cash crops and other crops grown organically)			
Farmers also have non-organic crops (home consumption or local sales)			
Farmers have plots in different conversion statuses If yes: same crops in organic/conversion?			

	Control point if there is part conversion	OK	PF	NF	N/A
6.1.1	There is no parallel production . <i>If there is: for what crops/does project plan to market these products as organic?</i>				
6.1.2	There is sufficient separation between organic and non-organic fields.				
6.1.3	Conventionally managed crops are not grown on the organic fields (e.g. intercropped).				

6.2 Conversion Period

- *Description of rules for determination of conversion status of farmers by ICS /Arguments for setting beginning of conversion for first inspections.*
- *Overview of conversion status of the farmers group*

6.3 Overall Production System

	++	OK	--	N/A	Comments
Crop rotation (if applicable)					
Intercropping					
Diversity on the farm					
Biodiversity in surroundings					
Soil fertility management					
Soil erosion control					
Pest and disease management					
Weed management					
Sustainability of production system in general					

6.4 Fertilization

Description	Yes	No	Comments
Livestock manure used			<i>If yes: Composted? Origin?</i>
Green manure / mulching done			
External inputs used for fertilization			If yes → give details below
Trace nutrients used in crop production			
Sewage sludge used on arable land			
Nutrient budgeting done			

	Product (active ingredient)	Producer/brand name	Quantity (average) & crop	Permitted & GMO free?	
z				YES	NO*
y				YES	NO*
x				YES	NO*
w				YES	NO*

* for any prohibited inputs → details needed: which farmers, when, resulting sanctions

6.5 Pest and Disease Management

Description	Yes	No	Comments
External inputs used for pest and disease management			If yes → give details below
Homemade preparations used for pest and disease management			If yes → give details below

	Product (active ingredient)	Manufacturer/brand name Or approximate compositions	Quantity (average) & crop	Permitted & GMO free?	
z				YES	NO*
y				YES	NO*
x				YES	NO*
w				YES	NO*

* for any prohibited inputs → details needed: which farmers, when, resulting sanctions

6.6 Seeds and Planting Material

	Crop (seed/plant)	Quality (organic, non-organic, treated)	GMO free	Details (treatment, origin, attempts to obtain organic propagation material)
a				
b				
c				
d				

6.7 Contamination

	Control point	OK	PF	NF	N/A
6.7.1	There is no pesticide drift from neighboring farmers/ appropriate measures taken to prevent drift				
6.7.2	No contamination by irrigation water / appropriate measures taken to minimize risk				
6.7.3	Spraying equipment is used ONLY for organic treatments (or carefully and reliably cleaned)				
6.7.4	Other contamination risks minimized (malaria prevention programs, heavy traffic, industry)				
6.7.5	There are no prohibited inputs stored on the farm (except if there is non-organic unit & clear separation of input storage)				

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

6.8 Post Harvest Treatment (Farm Level)

Description of Harvest Procedures

Harvest period & average yield estimates

Crop	Harvest period	Average yield (fresh or dry?)

Description of Post Harvest Processing Activities and Processing Ratio

	Control point	OK	PF	NF	N/A
6.8.1	No contamination during storage and on-farm processing				
6.8.2	Only organic ingredients and/or permitted processing aids are used for processing				
6.8.3	There is no risk of commingling with non-organic produce during post harvest processing				

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments & measures needed, N/A = not applicable

7 Buying, Processing, and Handling

7.1 Buying and Handling

Description of Buying Procedures

Evaluation

	Compliance criteria	Cat.	OK	PF	NF	N/A
7.1.1	At delivery/buying points the organic status of the farmer is checked . Only the organic product of certified organic farmers is considered as “organic product”.	A				
7.1.2	The verification of the organic status is done on basis of the certified farmers list (buying lists based on certified farmers list).	A				
7.1.3	There is demonstrated evidence that farmers only sell products from their own certified land .	A				
7.1.4	The amount of product supplied is compared with the estimated yield . In cases of doubt, the product is kept separate until clarification is made.	B				
7.1.5	Deliveries/purchase are registered in a buying record that states at least the date, the farmer’s code, delivered quantity (& product), and the organic quality.	A				
7.1.6	The farmer is issued a receipt , which indicates the farmers name (or code), delivered quantities, and organic quality.	B				
7.1.7	Buying personnel are trained, knowledgeable, and competent in implementing the organic buying rules (as outlined in the manual).	B				
7.1.8	There is no conflict of interest between organic product flow control and the income of the buying officer.	B				
7.1.9	The inspection confirms that the product flow is traceable and consistent and that the purchase has been performed correctly, according to their certified status.	A				

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments &measures needed, N/A = not applicable

Description of Product Flow after buying until export

Evaluation of handling procedures in general

	Compliance Criteria	Cat	OK	PF	NF	N/A
7.1.10	The organic product has to be kept separate from any product in conversion or non-organic product at all times. The separation system must be clear.	A				
7.1.11	If in-conversion products are for sale as “organic in conversion”, then these products have to be kept separate from all organic and non-organic (conventional) products at all times.	A				
7.1.12	During storage and transport the organic products are labeled at all times as “organic”.	B				
7.1.13	For transport to another unit the following additional information is stated on label/accompanying papers: name of owner of product, “certified by XXX”, and lot number (if applicable).					
7.1.14	Storage areas must be labeled as “organic”. If non-organic and organic produce are stored unsealed in the same room, there has to be a clearly defined, well labeled, and physically separate section of the room allocated to the organic produce.	B-C				
7.1.15	Warehouse personnel are trained, knowledgeable, and competent in implementing the organic storage rules.					
7.1.16	There is no fumigation, irradiation/ionization, of the products at any stage of the product flow.	A				
7.1.17	Facility pest management is according to the applicable standard. The organic product is not contaminated.	A				

OK= Fulfilled (ok), PF= partly fulfilled → comments needed, NF= not fulfilled → comments &measures needed, N/A = not applicable

7.2 Processing (Central Processing Units)

→ include report chapters on processing (different for each CB)

7.3 Product Flow Verification

(spot check for product flow buying → transport → warehousing → processing → export)

Product & period	Documents used	Results	Comments

8 Compliance Assessment and Conclusions

8.1 Compliance with previous conditions

8.2 Proposed Corrective Measures

Identified non-compliance	Proposed corrective measure	Deadline

Additional comments or suggestions for improvements:

8.3 Certification Summary

→ Overview of certified farmers (total number of farmers in which status total quantities, certified products)

No. of farmers	Total area (ac)	Product(s)	Quantity	Certification status As per farmers list date XXXX

The operator has been confirmed to produce and label organic products according to above defined organic regulations/standards and agrees that sanctions will be imposed in case of violations. The undersigned herewith confirms that all information given is correct to the best of his knowledge.

ICS Manager

Inspector

.....
Location, date, signature

.....
Location, date, signature

9 Appendices

D. FARM RE-INSPECTION REPORT (SAMPLE)

Farmer Name, Village		Farmer's code	ICS Operator	
External Inspector		Date of Inspection	Internal Inspector	
Standards according to which certification is proposed by ICS			Persons present during inspection	
Regulation 2092/91		NOP	Farmer	Field Officer
Other:			Others:	

Area organic cash crop	No. plots	Products, <u>CROPS to be certified</u> (intercrops)	Organic status

Area other crops org. managed	No. plots	Crops	Comments

Area non-organic unit	No. plots	Crops	Comments
TOTAL FARM AREA			

Control Point Part Conversion Farms			OK	PF	NF	N/A
6.1.1	There is no parallel production					
6.1.2	There is sufficient separation between organic and non-organic fields of the farmer					
6.1.3	Conventionally managed crops are not grown on the organic fields (e.g. intercropped)					

Description of fertilization (org. managed fields)	Yes	No	Comments			
Livestock manure used			Composted? Origin?			
Green manure/mulching						
External product fertilization	Manufacturer/supplier/specification		Crop/Quantity (kg/yr)	Permitted&GM free		
Z				YES		NO
Y				YES		NO

Description of pest management (org. managed fields)	Yes	No	Description of pest management	Yes	No
External inputs used for pest and disease management			Homemade preparations used		
Product or preparation	Manufacturer/specification		Crop/quantity (kg/yr)	Permitted&GM free	
Z				YES	NO
Y				YES	NO
X				YES	NO

Planting material (seed/plant)	Quality (org., non-org. treated)	No GM	Details (treatment, origin, GM declaration)
Z			
Y			
X			

Control Point Contamination			OK	PF	NF	N/A
6.7.1	There is no pesticide drift from neighboring farmers					
6.7.3	Spraying equipment is used ONLY for organic treatments (or carefully cleaned)					
6.7.4	No relevant contamination by other sources (malaria eradication programs, heavy pollution) :					
6.7.5	There are no prohibited inputs stored on the farm (except if non-organic unit & clear separation of input storage)					

Comments

	++	OK	--	N/A	Comments
Crop rotation (if applicable)					
Intercropping					
Diversity on the farm					
Bio-diversity of surroundings					
Soil fertility management					
Soil erosion control					
Pest and disease management					
Weed management					
Sustainability of production system in general					

Overall assessment of animal husbandry	Specific problems / contamination risk for organic crop
---	---

	Control point post harvest treatment on farm	OK	PF	NF	N/A
6.8.1	There is no contamination of the organic products during on-farm processing or storage				
6.8.2	Only organic ingredients or permitted auxiliaries are used for processing				
6.8.3	Organic products are not commingled with non-organic produce during post harvest handling				

Document screened for this farmer (document correctly filled in? Documents consistent with one another?)	++	OK	--	None available	Not checked	Comments (how documents completed for this farmer)
Farm entrance form/basic data form						Date of Registration
Field history						
Village map						
Field map						
Internal inspection report						
Farmers diary / other update documents						
Field advisor's notes						
Buying receipts and ICS buying list info						

	Compliance criteria	OK	PF	NF	N/A
5.4.4	All fields under management of the farmer (including conventional fields) have been registered				
5.4.14	The data about the farmer is consistent in different documents & all important aspects are documented				
5.5.3	Internal farm inspection was complete (field visit, interview with the farmer, all farming aspects covered)				
5.5.4	Internal inspection has covered product storage & post-harvest handling				
5.5.5	The internal inspection was thorough. All non-compliances have been duly identified.				
5.5.6	Any corrective measures have been communicated to the farmer. Follow up on implementation.				
5.5.7	Internal inspection report has been filled in accurately.				
5.5.10	Yield estimates by ICS are trustworthy for this farmer.				
5.5.12	Important findings by ICS during the year have been documented sufficiently for this farmer.				
5.7.5	Internal inspector did not have conflict of interest in visiting this farmer.				
5.8.3	Farmers are aware of the certification requirements (internal organic standard).				

This season the farmer has been inspected times Field officer/field advisor has visited times

Comments

Overall evaluation of performance of farmer with regard to compliance to above certification standards	Necessary improvements for ICS (and/or the farmer)
Fully compliant	
Compliant; improvements required	
Not compliant	

Signature of Inspector, Place, Date

Version 2.8. 2004

Appendices 1, 2, and 3 describe an exercise of a coffee project's evaluation of their ICS. This first appendix describes the project and available documents. Appendix 2 gives another document in an Excel table. Appendix 3 gives a sample solution of an external inspector.

E. Appendix 1 Description of Coffee Case Study

COFFEE UNION XXX ORGANIC ARABICA COFFEE PROJECT

INTERNAL CONTROL SYSTEM (ICS)

GENERAL

The Internal Control System (ICS) is a system that guards the integrity of the organic quality of the products generated by the registered contracted farmers. It is a system in which all persons dealing with the product (farmers, agents, store keepers, and processors, etc.) are identified, registered, instructed about the requirements for organic certification, and contracted to ensure compliance. The activities of these persons are then monitored in a system of regular visits and documented control. Besides this, the persons involved are made aware of their common responsibility for the product, which implies a certain social control. In case of deviation from the standards, the ICS has defined rules on action to be taken. The responsibility for the implementation of the internal control system lies with COFFEE UNION XXX (1984), Ltd. Organic Coffee Project. The ICS defines specific the responsibilities of each level in the project. It should provide for transparency, which is clearly documented so that the external inspection agency can easily understand and evaluate the functioning of the system. The personnel involved must get training to perform their duties accurately.

INTRODUCTION TO PROJECT AREA

The project is in Place XXX region. The dominant feature of the region is Mount Place XXX, which is 5894m above sea level, the tallest mountain in Africa. Place XXX is traditionally an important coffee producing region in the North of Tanzania on the borders of Kenya. The region is comprised of five districts, Rombo, Hai, Town XXX Rural, Same, and Mwanga. Place XXX Native Cooperative Union, COFFEE UNION XXX (1984), Ltd. operates in three districts, Rombo, Hai, and Town XXX Rural. The districts lie on the slopes of Mountain Place XXX. The soils in these districts are characterized by potash rich soils of volcanic origin. Currently, the soils are no longer fertile due to constant cultivation and the depletion of important nutrients as a result of continuous crop production and erosion without considerable efforts of replenishing the same. Rainfall distribution in these areas is fairly reasonable, diminishing year after year as a result of human activities leading to environmental degradation. However, the slopes of Mountain Place XXX continue to be famous producer of mild Arabica coffee. The mild Arabica coffee grown on these slopes is considered to have higher quality than both Robusta and hard Arabica. Mild Arabica coffee is grown best on higher altitude between 1000 – 2000m.

Coffee is the major cash crop in the three districts under COFFEE UNION XXX. Small-scale farmers are the most important actors and account for 98.3% of the total coffee produced. Estates contribute 1.7%. This means majority of the farmers in the area under consideration rely on the income derived from coffee.

Adverse low world market price for coffee over the past years relative to high input prices has seriously affected social and economic well fair of the coffee farmers in the region. Many farmers have abandoned their coffee plots and this has led to increased poverty among the farmers.

COFFEE UNION XXX (1984), Ltd., being a coffee farmers organization, has embarked on an organic project to alleviate this adverse condition for the farmers and respond to consumer's demands. Pioneers to the project are 1766 farmers from seven "Primary Societies" (PSs). These "Primary Societies" are Kinyamvuo, Marangu East, Mrimbo-Uuwo, Kirua Vunjo East, Sikirari, Sama, and Uru North Njari. The chosen "Primary Societies" represent the three major coffee growing zones on the slopes of the mountain. The different villages and sub-villages in the different zones from each Primary Society are shown in Table I.

The criterion used on the selection of the Primary Societies is based on the need to have a continuous supply of coffee from the farmers throughout the harvesting and buying season. The season for coffee ripening and harvesting starts at different times in different zones. The zones and the corresponding PS, village and sub-village, or sub-village are shown in Table II.

As mentioned above, coffee is produced predominantly by smallholder farmers; the average land holding is not more than one acre. The small plots are heavily intercropped with bananas (one of the staple foods of the area) and with other subsistence crops such as beans, maize, and yams. Fodder for livestock is grown on the borders of the farms. This is common in areas where zero grazing for livestock is practiced. The majority of coffee trees in the area is very old, leading to very low yields. The situation has been aggravated by poor maintenance as a result of low market prices and high input prices. A few areas have relatively young trees; these are areas that started growing coffee not long ago. These are mostly in the lower altitudes, and farm sizes are relatively big compared to those of middle and higher altitudes. Livestock keeping (cattle, goats, and sheep) is common among the majority of farmers. These animals are either kept indoors, tethered, or grazed, depending on the pressure on the land.

A DESCRIPTION OF THE PARTICIPATING PRIMARY SOCIETY

The main economic activity for the majority in the Place XXX region is agriculture; a few individuals are engaged in business. Coffee is the main cash crop. Other crops include food crops for subsistence, with any surplus being sold. Most coffee plots are intercropped with bananas and other annual crops like maize, beans, yams, and sweet potatoes.

Sikirari and Sama have similar features, which distinguish them from other Primary Societies. Farmers have their coffee plots surrounded by arable land for growing food crops (maize, sunflower, and beans) and other space for grazing animals during annual crop farming season.

Farmers in other Primary Societies cultivate other crops on the lower lands where is suitable. The farms are at an average distance of 10 km from the homestead. Intensive livestock keeping is common practice.

Agriculture is mainly rain-fed; no irrigation is practiced. Table IV shows the selected Primary Societies and their relevant data.

❑ MRIMBO-UUWO

Mrimbo-Uuwo is at the borders of Town XXX Rural and Rombo districts to the east. The coffee plots are mainly intercropped with bananas, beans, maize, yams, and sweet potatoes. Patches of land grown with pasture can be found neighboring coffee plots for farmers who have relatively large plots. The average land holding for individual farmer is 1.00 acre. Many farmers keep livestock for security, milk, and farmyard manure essential to their coffee and banana trees.

Vegetables are grown by a few farmers, especially those close to a reliable source of water. However, most farmers have small portions of land, about 1.50x1.00 m, where they plant vegetables for domestic use only. The varieties grown are local, not susceptible to pests and diseases common to vegetables.

The PS is spread over two altitudes: the middle, which is relatively flat, and higher, which consists of undulating hills separated by open valleys. Coffee thrives in this altitude.

Mrimbi-Uuwo is accessible by an all-weather road. A few feeder roads are impassable during the rainy season.

❑ MWIKA MSAE KINYAMVUO.

The Society, which is in the eastern part of the Town XXX rural district, falls in the higher-altitude coffee growing areas. A very small portion of it falls in the middle altitude zone. The physical features are mainly made of undulating hills separated by open valleys.

Coffee is the main cash crop. It is intercropped with bananas. Annual crops like maize, beans, cocoyams, and sweet potatoes are also intercropped depending on the thickness of the canopy. Open spaces are found on relatively big farms. These are mainly sown with maize and beans or pasture. Extensive vegetable farming is practiced in one sub-village (Mbale), where the soils and climate favors the crops. The business is mainly done by youths fond of ventures and have quick turnover.

Some farmers have small portions of land within their coffee plots where they grow vegetables for domestic use. Many grow local varieties. A few farmers still use chemicals on their vegetables. The PS is accessible throughout the year.

❑ MARANGU EAST

Marangu East is on the central part of the Place XXX region. It is accessible by a tarmac road. The PS stretches through the two zones (middle and higher) famous for coffee growing. Coffee is predominately found at the higher altitudes.

Farmers in these areas are more concerned with their coffee plots than those on the middle altitude because coffee is still the only economic livelihood that they can depend on. This is in contrast to their counterparts, whom have been derailed from their coffee farming business by the tourist

industry. Tourism and related businesses have flourished in Marangu, especially at Marangu Mtoni, which is the main entrance for tourists coming to climb Mountain Place XXX. However, the situation has been seriously affected by the low prices for coffee and its related inputs.

The farming system is the same as for Mrimbo-Uuwo and Kinyamvuo; however, farmers at Mshiri Masia have their coffee plots surrounded by open places planted with either pasture or food crops. Varieties grown in this area are mainly local, although a few farmers use exotic varieties. Many believe the myth that they demand too much in terms of chemical use and lead to soil degradation and accelerate erosion. The portions are either on a steep area where soil erosion cannot easily be controlled or the soils are not suitable for coffee growing.

❑ **KIRUA VUNJO EAST**

Kirua Vunjo East is in the northern part of the Town XXX rural district. Farmers at the higher altitudes depend on coffee, the only cash crop. There is not much coffee at the middle altitudes. The villages at the higher altitudes are mainly on undulating hills with the special characteristic that each hill is occupied by individuals descending from the same clan. They have relatively big farms, surrounded mostly by open space for growing food crops and pasture. Vegetable farming is also done by some farmers.

Soil fertility reclamations and management practices are observable in the middle altitudes, especially in Mero village. Rainwater harvesting is the main practice. Farmers' efforts are complimented by support from Place XXX Environmental Development Association, KEDA, a local non-governmental organization, whose major activity in the area is to encourage and train farmers on aspects of soil conservation, rain water harvesting, and establishment of tree nurseries.

❑ **URU NORTH NJARI**

The PS is accessible throughout the year and sits on undulating hills mainly separated by rivers or streams. Most coffee plots lie on steep land. Soil control measures are attempted by majority of the farmers. Coffee farming is the main economic venture for many households. Few have patches of land open for growing other food crops, pasture, and vegetables. However, their main land for cultivating maize, beans, and sunflowers is in the low lands on rented or owned land.

❑ **SAMA AND SIKIRARI**

The two Primary Societies are in Hai District to the west of the Place XXX region and lie at a distance of 8 km between them. The two societies have similar characteristics, made of migrants from the different parts of Place XXX; some come from Arusha. Both lie at the middle altitudes, experiencing a relatively hot and dry climate, especially during the dry season. The soils are relatively fertile compared to other areas.

Farmers own relatively big properties, partly used for coffee, growing food crops, and grazing livestock. The farmers are not close neighbors, as is the situation in other PSs. the average distance between the farmers is 100m..

Livestock keeping is common to many farmers. Each individual keeps an average of five head. Most farmers use farmyard manure in their food crop plots. The two PSs are famous for maize and beans production. Maize and other crops (other than the coffee plots) are commonly produced with chemical fertilizers and pesticides.

A few farmers who are accessible to water from shallow wells grow vegetables. Chemicals are also commonly used here.

FARMER PROFILE

Coffee farmers in Place XXX are characterized as progressive farmers. They acquired the title from coffee farming returns. From growing coffee, most farmers have made a lot of progress in their communities. Many have put up houses with corrugated iron sheet roofing, a few with cement blocks. Traditional houses made from banana fronds are almost extinct. Education of coffee farmers, his /her children carried first priority in possible uses of coffee income. That is why majority of coffee farmers and their children can read and write. Accessibility in the villages is relatively good compared to other regions. All project sites are accessible; however it is difficult getting to some areas during the rainy season. Local governments in collaboration with the villagers are making an effort to make these roads passable throughout the year.

ORGANIC PRINCIPLES PERTINENT TO COFFEE PRODUCTION

The principles are:

- ❖ Pruning: In addition to invigorating the branches and maintaining production every year, pruning creates an unfavorable microclimate for the existence and reproduction of pests and diseases. The operation is done twice a year, with heavy and light pruning. Heavy Pruning is done right after harvest and is basically meant to remove branches damaged by harvesting and to select branches for future production. Light pruning is mainly done during the rainy season to reduce vegetative

growth and also to select branches for future production. This operation can be repeated depending on weather.

- ❖ **Mulching:** Mulching is essential because it provides the soils with protection from erosion and direct sunlight that may lead to excessive evaporation of soil water, and it suppresses weeds. When the mulch decomposes, it releases the nutrients in to the soil.
- ❖ **Application of manure:** All manures (compost, green, and farm yard manure) should be applied frequently to the farm. In addition to providing the plant with nutrients, manures improve soil structure. Leguminous crops, such as beans add nutrients to the soils. Farmyard manure is composted and ready for use after three months. Direct application to the farm is not recommended.
- ❖ **Control of shade:** is the location of shade for plantains or trees should be well maintained. Coffee trees need shade, but not be too much to avoid the multiplication of pests and coffee disease pathogens. Where shade is not adequate the growers should be encouraged to plant shade trees.
- ❖ **Soil conservation measures:** Contouring and terracing where applicable is important in controlling soil erosion
- ❖ **Prevention and control of pests and diseases:** This is done by use of chemicals from plants or waste from animals.

CERTIFICATION YEAR

The certification year is specified to be from 1st October to 30th September. This corresponds to the beginning of the first flush of flowers for the coffee crop for the forthcoming season. Flowering starts sequentially from the lower and middle altitudes in October through to December. Harvesting also corresponds to the flowering periods starting in May in the lower and middle altitudes through to October in the higher altitude.

Major operations on the coffee trees and fields during this period starts with pruning. It is an important operation because it increases vigor to selected branches to produce healthy beans and assures the farmer a given level of output in every season with minimum variation.

INTERNAL ORGANIC REGULATIONS

Below is a list of internal regulations for the growers. These should be prepared in a manner such that the document is at the disposal of every grower for reference in case of need.

- A grower (a farmer in the project) intending to control pests or disease to his/her plot will use only allowed organic or natural pesticides or fungicides.
- The farmers will inform the FO of any intended applications of organic substrates and to agree to follow advice the FO may give him.
- Each grower will report to the authority the use of any prohibited input by a colleague on his/her plot.
- A neighbor to a grower who has decided to spray/use unauthorized input will be reported, and precautionary measures will be taken for the product to be harvested from the growers.
- Growers growing maize, beans, or any other annual crop in coffee plots or arable land adjacent or neighboring the organic plots will have their seeds approved by the FO before sowing. Selection of seeds for future use must be done when the crop is in the field. This should be done on a crop growing on good soils and with a healthy product, e.g., big ears in case of maize. Techniques for making the selection will be imparted to the growers.
- No grower will be allowed to plant new coffee seedlings on his plot from sources not known to the FO or authority. All seedlings will be provided to growers by COFFEE UNION XXX from their coffee nurseries or other approved source prepared according to organic regulations.
- Growers shall not be allowed to borrow equipment from neighbors or any farmer who is not in the project. An inventory for all equipment possessed by the growers will be made to know exactly what each grower is missing.
- All members of a grower's family will be kept well informed of all organic rules and regulations.
- All growers will have a notebook for recording important farming activities, costs, sales, and revenues. Advice from the FO or whomever is responsible for organic farming must also be recorded.
- The PS leadership with supervision of the FO will control the buying of coffee at the society level. A growers list and growers buying record list will be maintained at the PS office, and each grower will be provided with a bag marked with colors corresponding to the type of coffee he/she is entitled to sale during the season. The FO will arrange picking and selling days by the farmers. This will enable the FO to control infiltration of parchment coffee from farmers not in the project.
- A separate store for organic coffee will be earmarked at the PS level. Contamination from other types of coffees will be highly controlled. No bags used for other types of coffees will be used. Bags used in organic parchment coffee will be marked with the word ORGANIC.
- Haulage of organic coffee from PS to Tanganyika Coffee Curing Company, TCCCO, Ltd. will be done by a vehicle carrying nothing other than organic coffee. The coffee at TCCCO will be kept in a different storage area removed from the storage area for conventional coffee. The Production Manager and those responsible in the factory will be provided with training in organic production processes and standards.

- A grower will not use any industrial agricultural inputs on his/ her plot unless recommended to do so by the project staff.
- A grower will wash—not spray—their livestock. This will be done at a distance from the coffee plots. Manure from the washing place will not be used in coffee plots.
- A grower will use SPOTON where readily available. “Acaricides” applied sparingly to the back of the animal has the same effect as those diluted with water.
- Seeds for other crops or vegetables grown within the plots or field adjacent will always remain untreated with any industrial chemical.

RISK ASSESSMENT

➤ Risks during farming

❖ Doubtful farmers

Farmers who do not trust organic practices or recommendations may turn back to the use of conventional practices. This is possible during the initial years of the project because most farmers still believe that the use of chemicals is the only way to get a high yield. Peer pressure to adhere to organic practices and constant follow-up by FOs will minimize the risk.

❖ Chemical contamination from neighbors not in the project.

Neighboring farmers should be encouraged to attend organic training sessions and should be given first priority to be enrolled into the project during project expansion.

❖ Contamination from spraying livestock for ectoparasites.

This will be handled by promoting and encouraging washing rather than spraying and ensuring that the washed cow does not run to the coffee plot and that the remaining solution is not poured onto the coffee plot. Manure from where the washing is done should not be put on the coffee plots or nearby arable land.

❖ Borrowing equipment.

It is prohibited to borrow knapsack sprayers from farmers who are not in the project. Contracted farmers should borrow equipment from other farmers in the project and no one else. If the farmer wants to borrow equipment from a non-contracted farmer, permission must be sought from the FO.

❖ Contamination by inputs used for other crops.

Farmers should be discouraged from storing or stocking such inputs on their premises. Changing the farmers’ attitude towards organic farming practices should be our main goal. Organic training sessions on topics related to farmers’ other crops should be designed. If the use of chemicals is prevalent—for instance, where some crops like vegetables are grown commercially—and farmers are not ready to adopt organic practices, the area should not be considered for entry into the project.

❖ Mixing yield of parallel plots with that from organic plot.

To avoid this all plots surrounding the prospective organic plots should be clearly identified during registration. Also farmers who are not in the project but are neighbors of contracted farmers should have their activities clearly defined and noted.

❖ Contamination from conventional products during purchasing at the farm level at TCCCO store.

At all times the crop will be handled in clearly marked bags. At the farm level, three bags marked in red, yellow and green for **Conventional***, **N.O.P.**, and **Organic** parchment coffee, respectively, will be used. Sacks marked ‘ORGANIC’ will be used in transporting the crop from the Primary Society to TCCCO. Bags of the same mark will be used in taking the crop to the auction.

- ❑ * *Product from a registered farmer that is yet to be classified as an N.O.P. product.*

➤ Risks during processing

To avoid contamination from non-project members, the farmers should regularly be discouraged from borrowing/renting pulping machines or any other related equipment from non-project members. TCCCO has different lines for curing coffee; a separate line should be earmarked for handling ORGANIC COFFEE. Machine test runs must also come from the ORGANIC COFFEE lot.

SANCTIONS FOR DEVIATIONS

A farmer found to have violated the organic standards, especially if caught using un-authorized industrial inputs, will be expelled from the project and the contract revoked. Farmers will deliver their crop to the Primary Society in bags labeled with colors depending on the inspector’s recommendations.

A farmer found guilty of violating the organic standards will put all of his/her colleagues at risk of exclusion from the project. The farmers are well informed of the potential risks leading to their expulsion from the project and are encouraged to report any violations that are taking place or will take place on the neighbors' coffee plot(s).

Mild sanctions, such as extending the conversion period, may be used for farmers who could have violated the organic standards by ignorance.

Seeds dressed with unauthorized chemicals should not be used on coffee plots; if used, sanctions will be imposed on the farmer.

All organic farming regulations are clearly stated and elaborated to the farmers during trainings, and some are included in the contract form.

The certifier will be informed of intolerable deviations.

IDENTIFIED ACTORS:

Project Operator: The exporter: COFFEE UNION XXX (1984), Ltd.

Other actors:

Farmers
Primary Societies
COFFEE UNION XXX General Manager
COFFEE UNION XXX Project Manager
COFFEE UNION XXX Procurement Managers
TCCCO Production Manager
Field Internal Inspector

RESPONSIBLE PERSONS FOR THE ICS

The project has the following staff:

COFFEE UNION XXX General Manager	R. Kimaro
COFFEE UNION XXX Project Manager	G. Lyatuu
Procurement Manager	Mr. Tarimo
Production Manager	Felix Olendukayi
Internal Inspectors	Martin Shayo, Oswald Mushi, Glagys Swai, Aitaufoo Munisi, Raymond Mariki, Meck Mariki, Sebastian Shirima, Cosmas Meela and Nicholous Ngowi
Managers of PSs	Mrs Monica Mushi (Kinyamvuo), Mrs Hilda Lyimo (Marangu), Mrs Monyiaichi Mlaki (Mrimbo-Uuwo), Mr. Living Masawe(Uru Njari), Vicent Assey (Kirua Vunjo East), Mr. Wilfred Nkini (Sama), Ms Elikanenyi Makupa (Sikirari)

ROLES OF PROJECT STAFF

Project Manager

The Project Manager is the key person in the implementation of the ICS and has the role of approving farmers into the project and expelling farmers from the project.

The Project Manager is responsible for the maintenance of the farmer database and the production of the farmers lists and buying records. Information from the Field Officers and the Primary Societies (PSs) is entered and maintained by the Project Manager.

The Project Manager is responsible for approval of farmers for submission to the certifier for acceptance into the project.

The Project Manager will also bear the overall responsibility for the project and will be the contact person for the project for correspondence from outside sources (certifiers, competent authorities, etc.).

Procurement Manager

The Procurement Manager, together with the Field Supervisor, will be responsible for the collection of parchment coffee from the respective PSs and ensuring it is safe and clean; i.e., organic parchment coffee is delivered to TCCCO. The two will be responsible for maintenance of procurement records.

TCCCO Production Manager

The Factory Manager is responsible for curing of organic parchment coffee. He has to ensure that the organic coffee is passed through a clearly defined processing line and that all handlers the product are informed of organic principles and their compliance and that they should not bring in any material from outside.

Field Officer/Internal Inspector

The Field Officer (FO)/Internal Inspector performs a double role: he/she is both internal inspector of the project and encourages and advises farmers to be active organic farmers.

In the ICS, the FOs are active in registration, contracting, educating farmers, making crop estimates, and other administrative functions. They are also responsible for the sensitization of farmers and helping them to realize that the project is theirs and they should guard against use of chemicals, fertilizers, and other undesirable inputs into their farms/plots. They should ensure that the local officials and other interested parties are aware of the project and the requirements of the project. During the course of their visits, the FOs should check on the farmers' compliance with the organic requirements and report on any deviations or threats of violation from their counterparts to the Project Manager.

METHOD OF WORKING

General

Each FO has a limited number of farmers under his/her control. The farmers are visited frequently but internal inspection is done twice in the season.

(refer to Table IV for FO placements)

Registration, Mapping and Contracting

All farmers in the area and in the project fill and sign farm entrance form and are coded on the village maps. The coffee farmers who have agreed to join the organic project are contracted and recorded on project's growers list. Farmers who are not in the project, and neighbors of registered farmers, have their farms and names clearly represented on the village maps and entered into a general farmers' list. Important physical features such as landmarks that surround the registered farmers' plots are clearly shown.

Code Numbering

Each farmer receives a code number, which consists of two sets of letters indicating Primary Society Village and sub-village and a unique 3-digit number allocated to him or her within the sub-village: e.g., MR-UUK-000.

Advisory/Extension

The FOs will organize farmer meetings during which the current activities in the field are discussed and any inherent problems are examined and resolved. All FOs have a diary in which they must note daily observations made during their visits and the results of their discussions with farmers. Any deviations from the principles of organic agriculture must be noted and reported to the Project Manager. The organic standards contained in the ICS are drawn from the IMO and Naturland Manual for Quality Assurance.

Farmers also have notebooks or diaries for record keeping. The FOs sign the notebooks or diaries and comment when they visit the farmer.

Yield Estimates

Each season, an average yield estimate is made for each farmer depending on the preceding season's yields and weather patterns for the season in question. The individual farmer's estimate is based on the number and age of trees, rainfall distribution, and crop husbandry practices adopted during the season.

Compiling of Documents

The basic field documents, registration form, contract and annual farm inspection form are filled in by hand and kept in handwritten form. The farmers lists are stored on computer and the computer generates forms for the farmers lists and buying records. The farmers lists are updated prior to every harvesting season. The field officers receive a copy of the farmers lists and buying records.

Internal Inspection

Each contracted farmer is visited twice a year and these visits are recorded on the internal farm inspection forms. The farmers are inspected for compliance with organic standards. In case of any deviations, these farmers are reported to the field supervisor for sanctions.

An FO will do internal inspections within an area other than that in which he/she operates as FO. No FO will be allowed to carry out internal inspection in his/her PS. The Project Manager will coordinate the swapping of the FOs during the exercise.

MARKING OF SACKS

Before the harvesting season the farmers will be provided with different three types of bags distinguished by different labels, depending on what type of crop is expected from the farmer.

The preferred colors and type of crop to put in are:

Color	Type of coffee
Red	Conversion coffee
Yellow	N.O.P. certified coffee

Green	EU Certified Organic coffee
-------	-----------------------------

When parchment coffee is brought by the farmers to the “Primary Societies” for sale, it is then put into a sack marked **CONVERSION, N.O.P.,** or **EU ORGANIC COFFEE**, all of which will be transported to TCCCO in different vehicles and treated separately during curing, sorting, and bagging. When ready for export GREEN BEANS will bear the normal COFFEE UNION XXX (1984), Ltd. identification mark with additional wording either “**NOP 100% ORGANIC ARABICA COFFEE**” or “**ORGANIC ARABICA COFFEE**” and a **CERTIFIER’S logo**, depending on the content of the bag.

To avoid any contamination or cheating at the buying station, the FOs/Internal Inspectors will make regular visits to the buying post to ensure that only prescribed product is bought. Where possible the FOs should control the buying session for organic farmers.

BUYING SYSTEM

Purchasing is done on a regular basis as soon as the season opens on announcement at the annual general meeting by the Union through COFFEE UNION XXX(1984) management.

- ❖ Farmers have to identify themselves with their contract.
- ❖ A farmer is paid in cash and receives a payment receipt when delivering the organic coffee.
- ❖ Money lent to the farmer for investment in coffee cultivation is deducted from the payment.
- ❖ The quantity delivered, the number of the receipt, and the date of delivery are noted in the buying record.
- ❖ Farmers can deliver several times, as they choose.

STORAGE PROCEDURES

Organic produce has to be stored separately from conventional produce at all times. The certification organization wants to ensure that there is no possibility of mixing conventional and organic produce or fumigation of organic produce. Thus specific guidelines are developed to cover these aspects. These guidelines are called the storage and handling guidelines and are attached (Appendix....)

The FOs check all storage areas at the homes of the farmers, if there are separate storage areas, these are registered on the store declaration forms (COFFEE UNION XXX/ORG....).

When coffee is collected it is taken to a central organic store in TCCCO; this store is registered and laid down in the store declaration form. (Appendices....and.....). The stores comply with the handling procedures as described in Appendix...

REPORT AND EVALUATION SYSTEM

The project produces the following reports, which are sent to Naturland.

Certification year:

01/10/2004 – 30/09/2005: This year covers the main altitudes and takes care of important aspects in coffee from first flower flash differs to harvesting.

Document Submission Date:

Document	Date
ICS	September
Area maps	September (once at registration)
Annual report	October
Pre-buying report **	April, May, September

**Before the beginning of the harvesting season in lower middle and higher altitudes.

- The pre-buying report will contain the following information:
 - ❖ Number of farmers registered and contracted.
 - ❖ One copy of growers lists.
 - ❖ Primary Societies buying.
 - ❖ Deviations identified and action taken.
 - ❖ Potential threat(s) to ICS and control measures.

DOCUMENTATION SYSTEM

The project maintains a series of records. These records are designed to ensure that there is transparent system that can be verified by the certification body. The documents used in this system are outlined below:

- **Farmers Entrance Form** This form is the basic registration of the farmer with the project. It contains the farmer’s name and other details and summarizes the farm, acreage and number of trees, other crops grown, and livestock number. Each farmer has a code number on this form.

The farmer, and wife where applicable, signs on the left of the form to confirm that the information given on the form is correct. The field officer signs on the right side of the form, also to confirm that the information filled on the form is correct. Both the farmer and the Field Officer fill in the date when the information was entered on the form. The Primary Society's committee member signs to authenticate the farmer's information. The farmer's wife, if applicable, signs to confirm her husband's information and intention of the family to abide by organic agriculture practices. Neighboring registered farmers are shown on the sketch maps for each Primary Society. These forms are maintained and kept by the FO. The farmer entrance form contains the following information:

- ❖ Name of the Primary Society of which the farmer is a member
- ❖ Farmer's village and sub-village (where the farmer resides)
- ❖ Name of the farmer
- ❖ Farmer's code as per internal control system
- ❖ Signature of the Field Officer conducting interview
- ❖ Crop or crops grown, all crops grown in the field are listed
- ❖ Acreage of the field and number of trees
- ❖ The year when the crop was planted
- ❖ Last season's yield
- ❖ Information on the use of chemicals (whether chemicals have been used in the field and which year)
- ❖ Total acreage of the farm on coffee

❑ **Information on Annual Crops**

As mentioned earlier, most coffee farmers have both maize and beans, beans alone, or maize, beans, and sunflower plots in distant places in the lower altitudes. Farming in these areas is seasonal; thus the crops are grown once a year. The following information for these farms is provided:

- ❖ Location of the field
- ❖ Acreage of the field
- ❖ Crops grown in the past three years and practice
- ❖ Kind of seeds used (chemically dressed?) and type of fertilizer used
- ❖ Pest control measure used
- ❖ Acres grown with for annual crops

❑ **Animals**

- ❖ Livestock kept by the farmer, e.g., cattle, goats, sheep, and pigs
- ❖ Ecto-parasite control measure is mentioned
 - ✓ Note: Chicken, rabbits, and other small livestock are not registered. All animals being kept on the farm are registered regardless of ownership.

➤ **Primary Society Maps**

The location of each farm (by code number) is indicated on maps by village/sub-village; this is done on a large sheet of paper in collaboration with the members in a participatory fashion. After the map has been drawn and agreed upon with the members, the map is then transferred onto size A4 paper. The maps serve to guide staff and inspection teams to the location of the farmer's homestead and the maps contain the information necessary to achieve this.

The FO keeps one copy of the map, and a second copy is kept at the organic office. The maps will be updated each year to indicate any new farmers or landmarks.

The map of the PS is updated marking all villages, major and minor roads, trading centers, parish or church borders, etc. This map is maintained at the organic office and acts to give the general layout of the organic project area.

➤ **Farmers List:**

This is a record of all the farmers in the village. This record is kept on the computer at COFFEE UNION XXX (1984), Ltd. Organic Coffee Project office.

The farmers list contains the following information.

- ❖ Season that list was made
- ❖ Name of the Primary Society, (sub) village names with code numbers
- ❖ Name of the farmer and his/her code number
- ❖ Date the farmer signed the contract form
- ❖ Dates of inspection
- ❖ Information on whether the farmer uses chemicals or not

- ❖ Acreage of the farmer's land, which is organic
- ❖ Number of coffee trees per farmer
- ❖ Yield estimates per farmer for the coming season
- ❖ Deliveries in kg per farmer for last season

The computer showing the following information per Primary Society generates a summary sheet

- ❖ Primary Society's name
- ❖ Villages and sub-village name
- ❖ Number of registered farmers
- ❖ Number of contracted farmers
- ❖ Number of farmers visited once
- ❖ Number of farmers visited twice
- ❖ Total organic acreage
- ❖ Total acreage in conversion
- ❖ Total acreage conventional
- ❖ Total number of trees
- ❖ Total yield estimate
- ❖ Total deliveries last season

➤ **Farmers Contract**

Contains the guidelines for the farmer to follow to ensure that production is organic and the quality of the produce is commendable. The farmer signs this contract when he/she has understood the requirements and agrees to follow them. The farmer retains one copy while the other copy is kept at the office.

The contract acts as the project's proof to the certification organization that the farmer is aware of his/her organic obligation, that he/she will accept inspection visits, and that he/she agrees to follow the principles. The farmers sign the contract when they understand the organic principles.

➤ **Internal Inspection**

The internal inspection report form is used primarily to ensure that the farmer has remained an organic farmer. The form is also used to assist the Field Officer in highlighting any weaknesses of the farming system and assisting the farmer in improving the production of crops. Each organic farmer must be visited twice a year. The forms are stored with the entrance form in the field office.

➤ **Store Registration Form:**

All facilities used for storing, with the exception of on-farm drying areas and storage areas, must be registered before they are used. The form is filled out and specific attention is paid to the history of the facility to ensure that there is no risk of contamination from previous operations in/on the facility. One copy is maintained at the facility/store, while a second is maintained at the COFFEE UNION XXX (1984), Ltd. Organic Coffee Project. The storage areas under consideration are for the Primary Society in question and TCCCO. The PSs are required to flag storage areas where the organic coffee will be kept or partition the existing store and have two doors: one for organic and the other for conventional coffees

The TCCCO curing plant is in Town XXX Municipal, and, according to the internal control system, it is inspected and certified by IMO.

➤ **Facility Declaration**

This declaration describes the requirements for using the facility/store for organic products. The form ensures that before the facility is used it is adequately cleaned and that a responsible person has witnessed this operation. One copy is maintained at the store, while a second is maintained at the COFFEE UNION XXX (1984), Ltd. Organic Coffee Project office.

➤ **Curing Procedures**

The line to be used for processing organic coffee is closed down and cleaned properly before organic processing starts. This action must be documented on the facility declaration form (COFFEE UNION XXX/ORG). Additional advice and recommendations will be given by the certification organization.

The CERTIFIER must be informed beforehand when processing is to take place (to allow for an inspection during processing if this is deemed necessary).

➤ **Buying Record**

Purchases from the farmers are recorded in this record. The form follows the same format as the farmers list. The Primary Society's Manager and the FO enter and maintain the buying records on the form. The Organic Coffee Project office maintains a computer version separately. The form indicates the quantity of coffee expected to be delivered by the farmer and is filled out by the FO using the payment voucher books. The buying record contains the following information.

- ❖ Primary Society's name, (sub) village name and code number
- ❖ The season the form was completed
- ❖ Name of the farmer and his/her code number
- ❖ Estimated yields of the crop for each farmer in Kg
- ❖ Individual deliveries in Kg, date of delivery, and the number of payment vouchers per farmer
- ❖ Total deliveries for the whole form
- ❖ When the information is proved correct by the supervisor, he signs and dates the form

➤ **Payment Voucher**

For each delivery the farmer is making, a producer receipt is given to the farmer and one copy is kept by the storage facility. Receipts are numbered and contain the farmer's name and code, date, and quantity.

➤ **Excess Delivery Form**

This form is used if the farmer looks like he/she will deliver in excess of 10% over what was estimated. In this case, the farmer must be visited and the reason for the excess delivery investigated before the produce can be accepted into the store. If there is any suspicion that the farmer could be using another farmer's produce, then the excess delivery should not be accepted by the project. If the fields have had a better than expected yield or the field area is larger than what was expected and there is no risk of the produce being someone else's, then the excess delivery can be accepted by the project.

➤ **Excess Delivery Summary Form**

At the end of the buying season the excess delivery forms should be summarized and a copy of this summary sent to the certifier as part of the bi-annual reports.

➤ **Relative Registration Form**

Each field officer has to indicate if there are any direct relatives in the area that the field officer is monitoring. In the cases where the FO has direct relatives, the FO must ensure that an independent field officer who not directly related to the farmer conducts the internal inspection. The independent field officer should also verify the farm registration form.

Documentation Flow

The farmers lists are computerized and maintained in COFFEE UNION XXX (1984), Ltd. Organic Coffee Project office. At the beginning of the season a copy is printed out for the FOs, which includes the basic information on the project farmers. The FOs then use these records and conduct internal inspections, entering the date of the internal inspection on the printed farmers lists. In the event of any changes in the farmer's situation, regarding number of trees, amount of land, etc., the farmers lists are then updated by hand by the field officer.

At least one month prior to buying, the Field Officer sends the copies of the farmers' lists to the COFFEE UNION XXX (1984), Ltd. Organic Coffee Project office. The computerized records are then updated and the buyers' lists produced the office. The buying records and the updated farmers lists are then sent to the field before the start of purchasing.

The Primary Society Manager and the Field Officer maintain the buying records during the buying season in the field. In the COFFEE UNION XXX (1984), Ltd. Organic Coffee Project office, the receipts are entered into the computer version of the buying records. After the buying season is closed, the records are then reconciled.

By the end of the certification year (September 30th), the FOs complete the farmers lists, including the dates of the second internal inspection and the quantities of coffee delivered.

THE ORGANIC OFFICE

COFFEE UNION XXX (1984), Ltd. provides an office for project administration, accounting, and database management; the following files, which relate to the ICS, are kept at this office:

- ❖ The original PS (sub) village maps
- ❖ The area map
- ❖ Farmers list
- ❖ Copy of farmer's contract.
- ❖ Internal inspection reports
- ❖ Store registration forms
- ❖ Store declaration
- ❖ Buying records (when the buying period is completed)

Apart from these, the bookkeeping of the project operating costs is also kept at this office, as well as files with the minutes of management meetings and the inspector's reports. Old files are stored at the Project Manager's office with clear indication of the year.

FILES KEPT BY FIELD OFFICERS

- ❖ Farmers' entrance forms
- ❖ Copies of the maps of their villages
- ❖ Copies of the farmers list of their Primary Society
- ❖ Buying records (during buying season)

OTHER CROPS

The project is aimed at exporting organic Arabica coffee from Place XXX. However, a potential may be seen at times to encourage the export of other crops from the organic Arabica coffee farmers, by COFFEE UNION XXX (1984), Ltd. In this case, the project makes provision for the registration of annual crops, and Naturland will be informed three months in advance of the intention to export this crop. The crop will be registered on separate farmers lists and an additional internal inspection made to the farmers to compile yield estimates.

TABLE III: ZONAL INSPECTION AND PRE-BUYING SUBMISSION DATES

ZONE/ GROUP	PERIOD	INSPECTION		SUBMISSION OF PRE-BUYING REPORT	AREA TO BE PRESENTED
		FIRST	SECOND		
I	May-Sept.	November	March	April	Part Mrimbo, Part Marangu, Part Kirua, Sikirari, and Sama.
II	June-Dec.	January	April	May	Part Mrimbo, Part Marangu, Part Kinyamvuo and Part Kirua
III	Oct.-Feb.	March	July	September	Uru North Njari, Part of Marangu, and Part of Kinyamvuo.

TABLE IV: NAME OF FOs AND THEIR PLACEMENT

NAME	STATION	NO.OF GROWERS
Martin Shayo	Mrimbo-Uuwo	248
Aitafoo Munisi	Kinyamvuo	243

GladysSwai and Raymond Mariki	Marangu East	358
Meck Mariki and Sebastian Shirima	Kirua Vunjo East	244
Cosmas Meela	Uru North Njari	280
Oswald Mushi and Nicholous Ngowi	Sikirari and Sama	419

TABLE: IV: SELECTED PRIMARY SOCIETIES: BASIC INFORMATION

Primary Society	Neighboring PS	Total Members	Members Registered	Villages	Sub-Village
Kinyamvuo	Mamba North, Lole Marera, Mwika West	717	243	Kinyamvuo	Chona, Maha, Fumvuhu/ Iwura, Mongai, Mbale, Mberereni.
Mrimbo-Uuwo	Mamsera, Mwika, North East, Mahinda Kiruwani	836	248	Mrimbo-Uuwo	Kirimeni, Mrimbo-Kati, Uuwo Kati, Pangara, Kishingoni, Sembeti
Marangu East	Mamba North, Mamba South, Marangu West	3182	358	Mshiri Lyasongoro Arisi Lyamrakana Sembeti Samanga Rauya	Mshiri North, Masia, Mshiri South, Mauwo, Rengoni Lefuri, Marawa, Koteete, Rongi Wanja, Mnandeni A&B, Mori A&B Sengia, Mori A&B Kirefure, Sembeti. Tella, Kishingoni, Mauwo, Mkortongoni Mrokora, Kotenu
Kirua Vunjo East	Kilema Juu, Kirua Vunjo West, Kilema L:egho	1343	224	Kanji Kileuo, Mrumeni, Mero	Kanji Kati, Koshayo, Laso Kati, Laso Juu, Kanji Kumkari. Kileuo Kati, Kotule, Manzaoni. Leshaku, Mengeni Mero Kati, Usangi, Kolaria, Laso Chini.
Uru North Njari	Msuni, Shimbwe	1080	280	Uru Njari	Wami, Kyaurinde, Renoni.
Sama	Sikirari, Mae		156	Sanya Juu Magadini	Merali/ Majengo, Sanya Hoye, Kilingi. Mlangoni, Wiri, Langoni
Sikirari	Sama Karansi Olikolili		263	Ngaritati, Makiwaru, Naibili	Ngaritati, Ndarara, Mowara. Makiwaru, Tindigani A& B Naibili, Sabuku.

Farmer's contract

This contract is between the farmer named below and Kilimajaro Native Cooperative Union 1984, Ltd. (COFFEE UNION XXX).

Name farmer:	Farmer's Code:
Primary Society:	
Village:	
Sub village:	

1. I, the undersigned, accept membership in the **COFFEE UNION XXX 1984, Ltd. Organic Coffee Project**, certified and controlled by IMO/Naturland.
2. I promise to follow the advice given by the project staff. The advice is laid out in the internal control system (ICS) • as well as in the organic agricultural principles.**
3. I promise and guarantee that my family members are informed and will abide to the organic regulations as laid out in this contract.
4. I will not use pesticides, herbicides, or synthetic fertilizers on any crop within my coffee field(s).
5. I will avoid where possible the use of any chemical substance(s) on any other crop bordering my coffee field(s).
6. I will not spray, but wash my livestock for ecto-parasite control; when treating my animals with synthetic pesticides, I will follow the recommendations of the project staff on the application.
7. I shall endeavor to maintain the following organic principles:
 - Use recommended seedlings for coffee and clean planting or seed material, when available;
 - Maintain and improve soil fertility by mulching and applying organic matter, compost, manure, green manure, and/or crop residues;
 - Prevent soil erosion by keeping the soil covered at all times, constructing contour borders where necessary;
 - Avoid environmental degradation: cutting down trees unnecessarily, burning crop remains or any other organic material; dumping toxic material (batteries) or burning plastics;
8. I will engage myself to follow the organic management training program as organized by COFFEE UNION XXX 1984, Ltd.;
9. If I observe any violation of the organic principles by any member of the project, I will report this to the Internal Inspector or another responsible person of COFFEE UNION XXX.
10. I understand that any violation(s) of the organic principles, by even a single grower, will lead to the exclusion of this production or of the entire production. See ICS document, paragraph "Action on violations".•

• ICS document is available at COFFEE UNION XXX's headquarters, as well as at all buying stations/project offices.

** As stipulated in EC regulation 2092/91, particularly Appendices I and II, parts a and b.; available at COFFEE UNION XXX .

11. I will allow inspections by persons authorized by COFFEE UNION XXX and/or IMO or Naturland and provide unlimited access to my premises.
12. I promise to keep records of my farm activities.

COFFEE UNION XXX 1984, Ltd. will provide the following support:

1. Buy the organic export crop for a sustainable and transparent price, including a possible organic premium (depending on market) when the export crop is of suitable quality.
2. Provide support services to the farmers by way of Internal Inspectors and/or consultant(s).
3. Coordinate the entire project, including timely submission of the project for organic certification.
4. Make the ICS and organic regulations available to those project members who request to see it.

Signed

Place:

Date:

Name Farmer:

Name of farmer's wife
(if applicable)

Signature:

Signature:

Farm Registration Form

Date:	Farmer's name:
Primary Society:	
Village:	Farmer's code:
Sub-village:	Male / Female

1. Coffee

Name of Field	No. Trees	Acres	Year Planted	Last Yield
Total				

2. Chemicals used

Year	Chemical	Reason for use	Date (month)	Quantity
2003				
2002				
2001				
2000				

Remarks:.....

3. Other tree crops

Name of Field	Type of Trees	No. Trees	Date Planted	Yield Last year	Intercropped with coffee?	Chemicals used?	Which chemicals?

3. Annual Crops (note mixed cropping)

Name of Field	Acres	Crops in 2003	Crops in 2002	Crops in 2001

3.a: When last used chemicals:

3 b: Crop rotation/mixed cropping practiced?

Describe cropping system:

4. Animals

Animal Type	Number	Comments

5. Farmer's storage area

Description	Size (m ²)

6. Other activities / income generation

7. Other Comments

<p>I, the farmer, assure that all information is correct and that I intend to participate actively in the organic project. I bind myself to work according to the advice of the organic Field Officers (organic production standards) and not use any chemical pesticides or fertilizers.</p> <p>Farmer's Signature:.....Date..... </p>

Field

Officer's signature:.....Date.....

Internal Inspection Form

Date:	Name of head of household: M / F
Primary Society:	Name of wife:
Village:	Farmer's code:
Sub-village:	

1. Coffee

Name of Field	No. Yielding Trees	New trees planted Yr nr		Total no. of trees (yielding and non- yielding)	Last year's yield	Yield estimate (in 2 nd farm visit)
Total						

General Information				Comments/ Details	
Contract	Yes		No		
Chemical usage in coffee	Yes		No	On cattle: On other fields:	
Treated seed usage	Yes		No	Vegetables: Y / N	Inside coffee field? Y / N
				Maize: Y / N	Inside coffee field? Y / N
Coffee field					
Pruning	Good	Fair	Poor		
Mulching	Good	Fair	Poor		
Weeding	Good	Fair	Poor		
Erosion control	Good	Fair	Poor		
Farm yard manure	Good	Fair	Poor		
Cover (under-tree) crop	Yes		None	Type:	
Shade trees	Good	Fair	Poor		
Pest / disease problems	Which:			<i>(FO to confirm)</i>	
Pest / disease control					
Any other problem					
Storage	Comments, instructions, suggestions				
Cleanliness	Good	Fair	Poor		
Contaminants	Yes	No			

Other fields with crops or vegetables

Field name	1.	2.
Place & distance from homestead		
Adjacent to coffee plot?		
Owned or rented		
Acreage (Acres)		

Crops (list)		
Vegetables (list)		
Chemical usage (list)		
Source of seeds		
Are seeds treated?		

Cropping system		
Crop rotation Yes /no		
If yes, state order		
Field maintenance	Good / Fair / Poor / not seen	Good / Fair / Poor / not seen
Soil fertility management, (describe practices)		
Pest / diseases and control (describe)		
Any other problem or comment		

Animals

Type	No	How kept? (Confined/roaming)	Ecto-parasite control; How? Using what?	Location (how far from coffee trees)	Maintenance (care, health, sanitation, etc.)			Comment
					Good	Fair	Poor	
Cattle					Good	Fair	Poor	
Goats					Good	Fair	Poor	
Sheep								
Chickens					Good	Fair	Poor	
Other					Good	Fair	Poor	

Follow-up on advice given in last visit

Good, Fair, Poor, None Comments:

Advice Given To Farmer in this visit

Subject:	Advice
1	
2	
3	

Comments/questions from the farmer:

--

Conclusions (check appropriate answers)

Farmer's performance	Good	Fair	Poor
Farmer has violated	No	Yes	Mention:

organic standards			
Farmer must urgently improve	No, performance OK	Yes	Mention:
Farmer has improved since last inspection	Yes	No	Mention:

I, the responsible Internal Inspector, confirm that the information given in this report is correct and complete:

Date

Signature:

I, the farmer, confirm that the information mentioned in this inspection report is correct and complete; and that I will abide by the recommendations given:

Date

Signature:

F. Appendix 2: Farmer lists											
Code No.	Name of Grower	Date of Regist.	Date of Contract	Date of 1st Inspec.	Chem. use last date	Coffee plot and yield history				approval	
						Acres	No. Trees	Yield (Kg) 02/03 sea.	Yield (Kg) 03/04 sea.		
A	MK-MSE-001	Livingstone E. Mariki	10/4/2003	24/10/03	24/10/03	2000	1.25	800	200	240	conversion lastyear
A	MK-MSE-002	Albert E. Mariki	10/4/2003	24/10/03	24/10/03	1999	1.00	300	100	34	conversion lastyear
A	MK-MSE-003	James E. Mariki	10/4/2003	23/10/03	23/10/03	1998	1.00	300	100	42	conversion lastyear
A	MK-MSE-004	Wilfred Mgase	27/5/03	24/10/03	24/10/03	1991	2.00	100	50	73	conversion lastyear
A	MK-MSE-006	Eliangiringa E. Mariki	10/4/2003	28/10/03	28/10/03	2000	0.50	200	50	82	conversion lastyear
A	MK-MSE-007	Luka E. Mariki	10/4/2003	23/10/03	23/10/03	1995	1.00	400	200	85	conversion lastyear
A	MK-MSE-008	Hardson A Mbuya	10/4/2003	23/10/03	23/10/03	1998	2.25	1300	250	21	conversion lastyear
A	MK-MSE-009	Godfrey Mariki	10/4/2003	23/10/03	23/10/03	1996	0.50	280	350	58	conversion lastyear
A	MK-MSE-010	Eiisifa K.Mariki	10/4/2003	23/10/03	23/10/03	2000	1.00	600	100	63	conversion lastyear
A	MK-MSE-011	Rose Price Mbuya	10/4/2003	23/10/03	23/10/03	1989	1.00	600	150	0	conversion lastyear
A	MK-MSE-012	Ayumwi Mbuya	10/4/2003	23/10/03	23/10/03	1994	1.25	750	150	43	conversion lastyear
A	MK-MSE-013	James E. mbuya	9/4/2003	23/10/03	23/10/03	1999	1.50	750	100	19	conversion lastyear
A	MK-MSE-014	Jacob Abel Mbuya	26/5/2003	23/1/04	23/1/04	1997	0.50	300	120	63	conversion lastyear
A	MK-MSE-015	Elimhoo Fares	10/4/2003	23/10/03	23/10/03	1990	0.50	600	100	47	conversion lastyear
A	MK-MSE-016	Eisonguo E. Mariki	26/5/03	23/10/03	23/10/03	1990	1.50	400	30	55	conversion lastyear
A	MK-MSE-017	Eliangiringa Mlay	10/4/2003	23/10/03	23/10/03	1999	0.25	120	50	0	conversion lastyear
A	MK-MSE-018	Kundasai Mlay	10/4/2003	23/10/03	23/10/03	1999	0.25	120	100	149	conversion lastyear
A	MK-MSE-019	Emrodi E. Mlay	10/4/2003	23/10/03	23/10/03	1999	0.50	45	50	5	conversion lastyear
A	MK-MSE-020	Remy E. Mlay	10/4/2003	24/10/03	24/10/03	1998	0.25	100	100	0	conversion lastyear
A	MK-MSE-021	Ernest Mariki	27/5/03	24/10/03	24/10/03	1994	1.50	300	60	0	conversion lastyear
A	MK-MSE-022	Bryson Mariki	14/4/03	24/10/03	24/10/03	1999	4.00	2400	300	91	conversion lastyear
A	MK-MSE-023	Chifuel Mariki	14/4/03	28/10/03	28/10/03	1998	3.00	1000	300	177	conversion lastyear
A	MK-MSE-024	Rabson Mariki	26/5/03	28/10/03	28/10/03	1998	1.00	400	600	12	conversion lastyear
A	MK-MSE-025	Elimhoo Mariki	14/4/03	28/10/03	28/10/03	1990	1.00	400	100	167	conversion lastyear
A	MK-MSE-026	Harold R Mariki	14/4/03	28/10/03	28/10/03	1990	1.00	500	100	18	conversion lastyear
A	MK-MSE-027	Giliard Mariki	27/5/03	28/10/03	28/10/03	1990	0.50	100	150	1159	conversion lastyear
A	MK-MSE-029	Giftson Mariki	14/4/03	28/10/03	28/10/03	1980	4.00	1000	170	104	conversion lastyear
A	MK-MSE-030	August Mrema	26/5/03	28/10/03	28/10/03	1996	2.00	700	120	165	conversion lastyear
A	MK-MSE-032	Sauli Mariki	26/5/03	28/10/03	28/10/03	1972	0.50	300	50	96	conversion lastyear
A	MK-MSE-033	Exaud S. Mariki	14/4/03	28/10/03	28/10/03	1999	1.50	800	300	103	conversion lastyear
A	MK-MSE-034	Elias K. Mariki	14/4/03	28/10/03	28/10/03	1989	0.50	200	400	411	conversion lastyear
A	MK-MSE-035	Ronald Mariki	14/4/03	29/10/03	29/10/03	1970	1.00	500	400	90	conversion lastyear
A	MK-MSE-036	Lenias Mariki	14/4/03	29/10/03	29/10/03	1981	2.00	700	300	0	conversion lastyear
A	MK-MSE-037	Robson Mariki	14/4/03	29/10/03	29/10/03	1977	0.50	200	100	14	conversion lastyear
B	MK-MSE-038	Rodson Mariki	14/4/03	29/10/03	29/03/03	2001	1.00	400	60	74	conversion 2nd year
B	MK-MSE-039	Elidoriki Emanuel	14/4/03	29/10/03	29/10/03	2001	1.00	400	200	197	conversion 2nd year
B	MK-MSE-040	Usharika wa Mongai	14/4/03	25/11/03	25/11/03	2001	1.00	100	200	118	conversion 2nd year
B	MK-MSE-041	Stanley S.Mariki	14/4/03	29/10/03	29/11/03	2001	3.00	1200	425	137	conversion 2nd year
B	MK-CHO-001	Richard Kombe	27/5/03	30/10/03	30/10/03	2001	2.00	765	50	45	conversion 2nd year
B	MK-CHO-002	Rumishael Kombe	27/5/03	29/10/03	29/10/03	2001	0.50	194	23	120	conversion 2nd year
B	MK-CHO-003	Godfrey Kombe	27/5/03	9/10/2003	9/10/2003	2001	0.25	150	100	89	conversion 2nd year
B	MK-CHO-004	Eiangiringa Kombe	27/5/03	8/10/2003	8/10/2010	2001	1.00	450	30	186	conversion 2nd year

G. Appendix 3: Sample Solutions of the Coffee Project Case Study

- Exercises on internal organic standards and ICS documentation -

Project: Coffee Cooperative in Tanzania

Standards: EU-Regulation, Naturland Standard, & NOP

Characteristics:

- Approximately 2000 farmers
- Medium to high risk situation (varies by project site)
- Many farmers really need to be convinced to adapt organic farming practices

5.3 Internal Organic Standard

Evaluation of Internal Organic Standard

	Compliance Criteria	Cat.	OK	PF	NF	NA
5.3.1	There is a documented internal organic standard	B	x			
5.3.2	The internal organic standard regulates the following aspects sufficiently (with regard to requirements of certification standard):	B				
	- total farm conversion (if required) or requirements for separation of organic/conventional farm unit			x		
	- soil management & fertilization (incl. inputs)			x		
	- plant protection (incl. inputs)		x			
	- seeds and planting stock		x			
	- prevention of drift and contamination			x		
	- livestock husbandry (<i>if required by standard</i>)		x			
	- post-harvest handling & storage				x	
	- conversion period		x			
5.3.3	The internal organic standard is written in a language and manner that is clearly understood by all ICS staff .	B	x			
5.3.4	The (summary of) internal organic standard is presented in a language/form that it can be understood by farmers .	B	x			
5.3.5	All ICS staff is trained, knowledgeable, and competent in the implementation of the internal organic standard and the internal approval requirements.	B	Not checked			
5.3.6	The internal approval staff is familiar with the overall standard requirements of the (external) certification standard .	B	Not checked			

6.1: Rules are scattered in different documents, could be a bit better organized.

6.2: Some additional details missing to account for the situation that a couple of farmers have non-organic fields next to their homestead coffee plots. It needs to be included in the standard that sprayers used for non-organic applications must not be used for organic applications. If the farmer does not have second sprayer, the sprayer must be cleaned in presence of field officer.

Might need a clearer statement that all crops on the organic coffee plots must be farmed organically, but ICS staff is aware.

Non-organic fields close to the organic fields must also be checked, and it has to be ensured that no coffee is growing on these fields.

Harvesting, processing, and storage at the farm level must also be regulated.

NOP: should be written that fresh manure should be composted or decomposed well before application.

5.4. ICS Documentation

Note: The ICS farm documents are in local language. The distributed ICs documents are the English translation. (general evaluation only)

Farmer's Contract	<ul style="list-style-type: none">• Compliance with regulation required and the responsibilities of COFFEE UNION XXX outlined
Farm Entrance Form	<ul style="list-style-type: none">• Farm entrance forms are available.
Internal checklist	<ul style="list-style-type: none">•
Producer's list	<ul style="list-style-type: none">• Farmers lists of all registered growers are kept with: date of registration, date of contract, last date of use of prohibited inputs, acreage, no. of trees, yield estimate, and the stage of organic status.• OK

Contract:

ok

Farm Entrance Form

- Quite nice form, but will depend on how well it is actually completed.
- Detailed field history – good (but it would have to be seen how well the table is used!).
- Storage registered, but no detailed registration of processing – would be important to note if grower has his/her own coffee de-pulper or uses neighbors' tools.

Farm inspection Form

- The field history is asked again, which can lead to some mistakes because the same information is collected repeatedly and not always consistent among different documents.
- No explicit check of contamination from farmer's own non-organic crops (e.g., use of the same knapsack sprayer, storage of inputs for the non-organic crops).
- Intercrops ON THE COFFEE fields are not checked well e.g., could treated maize seeds also be used on coffee plot (sometimes maize is intercropped there). All questions about other crops only refer to 'other fields'.

H. Appendix 4: EXAMPLE OF A COMPLETED ICS REPORT

NOTES:

- This report form was completed during a test audit in April 2004.
- The format used is an intermediate version of the new IFOAM ICS report; a few aspects have been changed for the final report format.
- The report shall mainly serve as an example for the trainer of how the report format could be used.
- If considered useful by the trainer, the report could be given to trainees as an example of an ICS report; however it would be better if trainer tests the form himself/herself and then distributes his/her example report.
- The report describes a first inspection. Several chapters could not be completed because internal inspections had not yet started, etc.
- Comments are rather detailed.

INSPECTION REPORT

SMALLHOLDER GROWERS GROUP WITH ICS

Report No:

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1 Project

Operation (Smallholder Group) Name PineappleprojectXXX Organic Pineapple Project	Mandator/Commissioner PineappleprojectXXX Veg. & Fruit Canning Co. Ltd.
Operator Postal Address P.O. Box 83, Place AAA, Tanzania	Operator Physical Address (Village/Town, Country) Factory: place AAA, Road Farmers Group: BBB Village, CCC District of Place AAA Region, Country
Telephone: 00255-262725014 Fax: 00255-262725084 Email: PineappleprojectXXX@cats-net.com	ICS Project Manager: Victor L.

2 Inspection Details

<i>Inspector</i> NAME Also present: Consultant name 2		<i>Inspection Date(s)</i> 4/15 – 4/16/2004	
x	The ICS Manager was present during inspection	x	Announced visit
	Exit discussion was concluded		Unannounced visit
x	Risk assessment was done		Visit with focused re-inspections
<i>Organic standards for which certification is requested:</i> Regulation 2092/91, Naturland Standards, (NOP only from next inspection onwards)			
<i>Products for which certification is requested:</i> Sliced pineapple in natural juice (in tins), natural pineapple juice (in tins)			

2.1 Details of Inspection

Summary of instruction for the visit:

Complete first inspection visit with focus on overall risk assessment and assessing the necessary monitored conversion period.

Inspection Schedule

Date	Inspection Activity
14.4.2004	<ul style="list-style-type: none"> Travel from Place ZZZ to Place AAA Discussions with consultant name 2 about the project, screening of ICS document.
15.4.2004	<ul style="list-style-type: none"> Inspection of PineappleprojectXXX Factory @ Place AAA Travel to Njombe
16.4.2004	<ul style="list-style-type: none"> Travel to Madeke (4h) Inspection of pineapple farms Travel back to Njombe
17.4.2004	<ul style="list-style-type: none"> Reporting Final discussions with ICS Manager Travel to MPlace YYY
18.4.04 morning	<ul style="list-style-type: none"> Travel from MPlace YYY to Place ZZZ.

In the course of the inspection information was obtained from the following sources

	<i>Information Source</i>	<i>Details</i>
x	Interview ICS Manager	
x	Re-inspection of farmers	
	Witness internal inspections	
x	Interview other ICS staff	Field Officer Mr. Kihaka
	Interview those responsible for purchasing	
	Visit to local pesticide stores	
	Visit to neighbors / other farmers	
x	Visit to authorities	Long discussions with CONSULTANT NAME2 as the project initiator and project supporters/advisor.
x	Check ICS records	Only few available documents
	Check samples records	
	Check residue analysis	

OK= Fulfilled (ok), PF= partly fulfilled → Acceptable with conditions, NF= not fulfilled → comment & corrective measures

Language of inspection (if translation was used, give details)

Discussions with farmers in Kiswahili, discussions with ICS Manager in English & Kiswahili, reports completed in English. No translator was needed.

2.2 Overview on Inspection

<i>Project Site</i>	<i>No. re-inspected Growers</i>	<i>Comments</i>
Madeke village	6	Road to village was in extremely bad conditions due to heavy rain and was blocked for more than an hour. Thus there was not sufficient time to do the planned 10 inspections, although inspectors split in two groups.

<i>Inspected Purchase Centers</i>	<i>Comments</i>
None	Purchase will take place directly from farmers, no organic purchase yet.

<i>Inspected Processing Units as part of ICS Project</i>	<i>Type of Processor</i>	<i>Processed Product; reference to separate inspection report for processor</i>
PineappleprojectXXX Factory, Place AAA	Contracted processor	Only pre-assessment since present inspection only conversion inspection; see 2.1 PineappleprojectXXX
	x Own processing	
	Contracted processor	
	Own processing	

3 Project Description

3.1 Brief History and Background of Project

3.2 Activities of the Project

Overview of Project Sites

There is only one production site, at Madeke village, app. 5-8 h from Place AAA (depending on road conditions). No other villages are planned to be included in the organic project at present stage.

Description of all production steps

Pineapple production – collection of pineapples at farm gate – transport to factory – processing into canned pineapple products – transport to warehouse in Place ZZZ – storage – export by PineappleprojectXXX Place ZZZ.

	Compliance Criteria	Cat.	OK	PF	NF
4.1	An overview of the organic operation sites must be available, incl. a general overview of the farming system and agricultural practices of participating farmers.	B	x		
4.2	There must be a description of all the steps that take place from harvest to final sales, incl. identification of the entities responsible for the product at each stage.	B		x	

4.2: In the project description the warehousing in Dar and export activities by PineappleprojectXXX head office in Dar is not mentioned.

3.3 Basic Information about Production Area

3.4 Typical Farming System of the registered growers

If necessary according to project site

3.5 Farmers in the project

The farmers in the growers group are:

	In villages scattered over the project's area		Villages are closely located to each other/all in same area
	Scattered individual smallholder farms	x	Clusters of neighboring organic farms
x	A couple of farmers are registered per village		Basically all farmers in a village are registered

It is hoped that over time all pineapple growers of Madeke Village will be included in the organic project.

Total number of farmers:	Organic	
	In conversion	54
	Passive/suspended, etc.	

Up to 16.4.04, 50 farmers were registered in the organic project; 4 more farmers have been included in the project right from the beginning but due to different misunderstandings and problems (farmers not present during visit, farmers afraid that they can only sell to PineappleprojectXXX after registration) they could not yet be registered. It is proposed to consider them registered for this season if registration can be finalized by 1.5.2004.

4 Risk Assessment

Risk Assessment by the Project (summary of most important risks)

The most important risks identified by CONSULTANT NAME2 together with the project was:

- Land clearing by burning (commonly practiced in the area)
- Soil erosion
- Problems during buying (e.g., because road to village is so bad that it is easier to source pineapples elsewhere)

The first 2 issues have been tackled in detail in all farmers trainings and all member of ICS staff are aware of them.

However, this was not yet reflected in the ICS manual, which so far contains only the generic (example) CONSULTANT NAME2 risk assessment.

	Compliance Criteria	Cat.	OK	PF	NF
5.1	A detailed initial risk assessment has to be done at the beginning of certification (first year of certification or when informed about this requirement by certifier). This risk assessment has to identify risks at the farm level as well as during buying, processing, or (export) transport, while the product is under the responsibility of the ICS Operator.	B		x	
5.2	The ICS takes all measures to minimize the identified relevant risks.	B	x		

5.1. Risk assessment in ICS manual does not indicate the effectively identified risks.

OK= Fulfilled (ok), PF= partly fulfilled → Acceptable with conditions, NF= not fulfilled → comment & corrective measures

Risk Assessment by Certification Body

(if project sites very different → different risk assessment for different project sites)

Potential Risk Area	Identified potential risk (yes/no)		Evaluation of risk and prevention of the risk by project
	Y	N	
Organic Crop	X	Crop is typically grown with chemicals, difficult to grow organically	
	X	Not traditional product in the area, farmers not familiar with production	
Production Area	X	Easy access to prohibited inputs	
	X	Other farmers in the village/area grow the same crop with prohibited inputs	
Farmers	X	Farmers not well aware of organic production methods	
	x	(double weighing) Farmers have been found to use prohibited inputs on organic plots.	
	X	Farmers not really convinced of organic farming	

	X	Farmers also grow non-organic crops.	
	X	Risk of parallel production in “extended family”	Brothers/sisters plot managed by same farmer are included with the managing farmer. Products are collected at farm gate and the few unregistered pineapple growers. Farmland is bought from village chairman and remains the farmer’s land, even when fallow. Some farms also buy new follow land from village, but the land rights are now changing every year.
	X	Low social control among members	
	X	Uncertain land rights or fields changing regularly	
	X	Low level of general compliance with rules/legislation, region where fraud is seen as achievement	
	X	Low level of general compliance with rules/legislation, region where fraud is seen as achievement	
Project Organization	X	ICS staff not sufficiently qualified for efficient control	Buying at farm gates ensures rather good control. Price difference between other buyers and organic pineapples for PineappleprojectXXX may be up to 50%.
	X	ICS does not have sufficient staff or lacks means for effective control	
	X	The smallholder group’s size or activities have changed considerably.	
	X	Responsible ICS staff members have changed	
	X	Insufficient prevention of conflicts of interest	
	X	Yield estimate system and buying procedures in general do not necessarily prevent farmers from selling produce of their neighbors	
	X	Price difference between organic and non-organic is very high	
ICS Quality and Efficiency	X	(double weighting) ICS still not very well developed, formal deficiencies regarding some requirements (but no major differences between findings internal-external control)	
	X	ICS has failed to detect minor non-compliances (not threatening the organic integrity of product)	
	X	(double weighting) ICS has failed to detect major non-compliances → always highest risk category	
Sum of identified risk points: 3			

Risk Categorization:

x	Low risk
	Medium high risk
	High risk

The project is clearly low risk, even for this first inspection, where the ICS is not yet fully developed. The findings of this inspection and of various pre-assessments of the experts of CONSULTANT NAME2 have shown very clearly that in the remote project region, inputs for any crop (even occasionally) are not used by the farmers, whether in the organic project or not. Additionally, pineapple is very easy to grow organically in this region. Only a small portion of their products is marketed, so the incentives to invest in any inputs are also low. Additionally, CONSULTANT NAME2 has been training all organic farmers actively in active organic farm management (focus on improved field management methods, no burning, soil erosion control) for approximately 1 year and farmers seem to have picked up the instructions well.

4.1 Determination of Inspection Procedures

Qualification for Smallholder Group Certification

	Compliance Criteria	Cat.	OK	PF	NF
--	----------------------------	-------------	-----------	-----------	-----------

1.1	To be considered a “smallholder” the following must be fulfilled: <ul style="list-style-type: none"> • Cost of individual certification is disproportionately high (more than 2% of commodity value) in relation to sales value of the product sold. In addition, at least 3 out of 5 of the following requirements shall be fulfilled: <ul style="list-style-type: none"> • Average income lower than app. 5000 US\$/yr • Farm units are mainly managed by family labor. • Low-tech production system • Limited Capacity of marketing on his/her own • Limited capacity for storage/processing 	A	X		
1.2	There is homogeneity of members in terms of geographical location, production system, size of holding	A-B	X		
1.3	There is common marketing of the organic products	A	X		
1.4	Projects that do not qualify as smallholder group certification can still be certified as an organized group of growers (assistance in documentation, joint marketing, etc.) with common marketing system, but each member farm has be inspected by the certification body and has to keep its own documentation				
1.5	If farms (bigger than “smallholders”) are certified as part of a smallholder group certification project, the following additional criteria apply: <ul style="list-style-type: none"> • Every farm is inspected annually by both the ICS and the certification body. • Each farm has to keep most relevant farm documentation itself • Common marketing is the responsibility of ICS Operator (no marketing oneself) 	B	N/A		

1.5: At present only small farmers (average 5-8 ac land, bigger farmers up to 20 ac) are registered. Possibly a slightly bigger church farm of 50 ac will be part of the smallholder group. In this case the rules as outlined in criteria 1.5 will apply.

Determination of external control rate based on risk assessment and overall results of inspection

Square root N (or minimum number): 10 farmers (=minimum)

Risk Factor: 1 → Resulting minimum re-inspection rate (no. of farmers) for next inspection: 10 farmers

Additional considerations regarding re-inspection rate:

This was a first inspection with focus on risk assessment. Although only 6 farmers could be inspected due to the inaccessibility of the project village, a sufficient overview of the farms was gained, so that the number of re-inspected farmers was enough to confirm the beginning of conversion and to perform a thorough risk assessment and first assessment of the present ICS. By the end of 2004, a second inspection will take place just before harvest and sufficient time must be planned to do at least 10 farm inspections.

5 The Internal Control System

5.1 Structure and Organization of the ICS

Brief Description

The project was initiated by Mr. Leonard WWW and CONSULTANT NAME2. Mr. WWW left the project and moved to Place ZZZ, but still works some time for the project on an assignment basis. At present the ICS is organized by an external consultant (governmental field officer) who is contracted by PineappleprojectXXX for 3 days/for this task. Mr. Victor L. keeps all related ICS documents at his house and organizes the ICS together with the one remaining field officer. CONSULTANT NAME2 gives the project support in farmers training, ICS staff training, ICS manual development and project development.

There is a very detailed and complete ICS manual that was mainly prepared by external consultants: so far, only the training of farmers and the registration of farmers has been completed, the beginning of the internal inspection manual is planned for May.

There is basically no involvement of PineappleprojectXXX in the ICS of the Madeke Farmers group, and having an outgrower scheme is a new situation for the factory, which has always been bought all raw materials at the factory gate without any involvement in production or collection

Description

ICS Coordinator	Victor L. (Overall project manager = owner of PineappleprojectXXX: Mr. Bipu Desai)
ICS Approval Manager	Victor L.

Centers of internal control	Madeke village only, documents kept with ICS Coordinator at his home in Njombe
No. of internal inspectors	1 (Victor L.)
No. of field advisors	2 (Mr. Kihaka and Mr. L.)

Internal inspections are done only by Mr. L., but Mr. L. also does some field extension work. Both visit basically all farmers; there is not a certain group allocated to one field officer or the other.

Evaluation

	Compliance Criteria	Cat.	OK	PF	NF
11.1	The ICS operator has an organizational chart or table of responsibilities..	B		x	

11.1: The name of the field officer is missing in the table in the ICS manual. Roles of field officers is not correct; the internal inspections will be done by field supervisor Mr. L., not by the field officer.

5.2 ICS Manual

Brief Description of ICS Manual

Complete and very detailed manual in CONSULTANT NAME2 standard format (44 pages incl. forms). However, at present only certain parts have been adapted to the specific situation of PineappleprojectXXX; many parts are still the generic CONSULTANT NAME2 text and not yet fully adapted to the actual situation in the project.

	Compliance Criteria	Cat.	OK	PF	NF
2.1	There is an ICS manual, i.e. a set of documented forms and procedures of the internal control measures.	B	X		
2.2	The ICS manual covers in principle all relevant procedures (and their documentation): internal organic standard (farm production rules), farm registration, internal inspection, internal approval/sanctions, selling/buying, product handling.	B	X		
2.3	Internal ICS staff has up-to-date forms at hand and is aware of the valid ICS procedures as described in manual	C			X
2.4	Farmers have access to the ICS manual	C	X		
3.1	There is evidence that the ICS manual is reviewed on a regular basis and updated when necessary	B	X		
3.2	The ICS manual reflects in principle the internal procedures: farm registration and internal inspection	B		X	
3.3	The ICS manual reflects in principle the internal procedures: management & staff	B	X		
3.4	The ICS manual reflects in principle the internal procedures: approval/sanctions (incl. determination of conversion status)	B	N/A		

2.3: The manual is very newly developed, mainly by Mr. WWW, so during the inspection the ICS field staff, including the ICS Coordinator were not yet really aware of the procedures and forms of the manual.

2.4: The manual is so new, it is not yet available or known in village or with village chairman, etc. But all aspects important to the farmers have been communicated during trainings and there is no evidence that farmers will be denied access (most are illiterate anyway).

3.2: Farm registration procedures were different from procedures described in ICS manual. Even the form used was not the form as submitted in the ICS manual.

5.3 Internal Organic Standard

Evaluation of Internal Organic Standard

	Compliance Criteria	Cat.	OK	PF	NF
6.1	There is a documented internal organic standard	B	X		
6.2	The internal organic standard regulates the following aspects sufficiently (with regard to requirements of certification standard): - production unit/part conversion - soil management & fertilization (incl. allowed inputs) - plant protection (incl. allowed inputs) - seeds and planting stock - prevention of drift and contamination - livestock husbandry - conversion period	B		X	

6.3	The internal organic standard is written in a language and manner that is clearly understood by all ICS staff	B	X		
6.4	The (summary of) the internal organic standard is presented in a language and form that can be understood by the farmers	B	X		
6.5	All ICS staff members understand the internal standard and the internal approval requirements.	B	X		
6.6	The internal approval staff are aware of the overall standard requirements of the (external) certification standard	B		x	

6.1: The internal organic production rules are stated in the farmers contract.

6.2: Requirements on use of seeds and planting material are not correct (it needs to be stated that only organic pineapple suckers from farmer's own crop or fellow organic farmers may be used and that also all other seeds must be organic where possible and must be at least untreated otherwise). In the internal organic standard, it is not mentioned that burning for clearing fields or post-harvest is not allowed, although this is an important requirement that has also been communicated very clearly.

6.4: Contract is not yet translated to Kiswahili, but content has been communicated to all farmers and many farmers are illiterate anyway.

6.5 Mr. L. has attended two NGO WFW inspectors trainings. Yet, there is need for further training to understand at least the most important requirements of the EU-Regulation and the Naturland standards and their common interpretation.

5.4 ICS Documentation

Brief Description Documentation system

So far there are only 2 sets of registration forms (2 versions of same form). Documents are kept in a folder at the ICS Coordinators home, since there is no ICS office. Information is not organized by farmer but rather per document.

Evaluation

	Compliance Criteria	Cat.	OK	PF	NF	N.A
10.1	For each farmer to be certified, there is a written commitment declaration between the ICS and the farmer. The declaration must contain an obligation to fulfill the organic standard	A		x		
10.2	The agreement/contract (or enclosed documents) describes the applicable production standards and allows the inspector access to the farm. The consequences (sanctions) for violations must be clear.	B	X			
10.3	For each farmer to be certified a basic data form (farm entrance form, basic questionnaire) is available. The date of last application of prohibited inputs is recorded for every plot.	A-B		X		
10.4	The basic data form describes at least the total area under management of the farmer (incl. conventional fields) and lists the organic crops with their respective area (or e.g., approximate number of trees in case of mixed cropping).	B		X		
10.5	An overview map (village or community map) shows the location of each farm (all fields) with code numbers for each farmer. The map is dated.	B				
10.6	In cases where the registered farms grow (a) rotating annual crops or (b) also some non-organic crops, a farm map must be available showing at least the fields of each farmer with their respective crops and organic standard. The maps must be dated and contain sufficient details (land marks etc.) to identify the location of fields.	B-C	N/A			
10.7	For each farmer all relevant advice or training given shall be documented.	C		N/A		
10.8	For the farmer the following minimum information on his farming activities is documented with date: most important cultivation measures, use of inputs (with quantities, incl. homemade applications or seeds), harvested quantities, new fields/change in area (if so: last use of prohibited inputs), crops	B	X			
10.9	The internal farm inspection report (checklist) covers all aspects of the internal organic standard (organic production for whole farm or separation of organic & conventional farm unit, use of inputs, fertilization and soil management practices, plant protection measures, use of seeds, separation & prevention of contamination during harvest and any post-harvest handling, sustainable animal husbandry). The checklist includes an evaluation of the compliance of the farmer with the internal standard as well as necessary corrective measures/conditions or recommendations.	B		X		
10.10	All registered farmers are listed in a farmers list, which contains at least the following information: village/location, farmer's name, farmer's code, total area, area under organic cash crop (or number of trees, etc.), internal approval status (organic, conversion, etc.)	A		X		
10.11	As a summary of the internal inspections the following information must be available per farmer and should be included in the farmers list: date of registration, date of last use of unallowed	B-C			X	

	Compliance Criteria	Cat.	OK	PF	NF	N.A
	inputs, name internal inspector, date internal inspection, internal approval result for farmer, yield estimate					
10.12	Sanctioned farmers and farmers that have left the farmer group are recorded on a separate farmers list. The reasons and duration of the sanction (or reasons for leaving the group) are recorded.	B	N/A			
10.13	All documents of the ICS are kept for at least 5 years and available for inspection at any time.	B		X		

OK= Fulfilled (ok), PF= partly fulfilled → Acceptable with conditions, NF= not fulfilled → comment & corrective measures

General: Various existing documents such as old registration forms (1st version), diaries of field officers, content and participation of training seminars could not be checked during inspection because there are in the ICS Coordinator's private home, which was too far away to get the documents from there. For next inspection, ALL relevant ICS documents must be presented to the inspector.

10.1 & 10.2: There is a very simple commitment declaration ("I confirm that I have understood the rules for organic production") included in the farm entrance form. The actual contract that outlines in writing the organic production rules will be signed only at the end of the conversion period. If this will be accepted, the commitment declaration in the farm entrance form needs to be improved (at least as written in generic CONSULTANT NAME2 farm entrance form) and translated to Kiswahili.

10.3: On the farm entrance form there is no indication of last use of prohibited inputs for the "other crops". Also the table field history for "other crops" has been used incorrectly as importance grading of different crops (e.g., 01-crop = maize, because it is the most important crop for farmer). There is no field history for the pineapple fields, which would have also been better than only the indication "last use of prohibited inputs".

10.4: In some cases small pineapple fields as well as other fields within the project region (app. 5 km around homesteads) have not been registered, because farmer and field officers understood that the pineapples grown on registered fields would all have to be delivered to PineappleprojectXXX only, so they kept certain plots "out" to sell the pineapples also to other traders. The same applies to fields that are managed by the registered organic farmer on behalf of their relative. These fields had not been registered. This misunderstanding was clarified with the Field Officers and the missing fields will be registered as well.

10.5: A village map was prepared but was at village chairman's house, who was not at home during the day of inspection. The village maps were sent after the inspection.

10.6 Pineapples are grown as perennials. There is basically no rotation; therefore a farm map is not compulsory, but on the village map each field should be indicated. It was also discussed that a simple map for a small group of clustered farms may actually be the most appropriate way to record their different fields, planting date for each field, etc.

10.8 In the internal checklist. Sufficient since very low key production system.

10.9: In the checklist, the check on use of organic/untreated planting material and seeds is missing.

10.10. In present farm list (hand written) the following data is missing:

- total acreage (all fields under management of the farmer within the project area)
- approval status (at least "ok" if no inputs have been used for at least 3 years), from next inspection onwards the conversion status for each farmer will be known and can then be indicated explicitly.

It has to be said that the data basis for the presented farmers list is somewhat unclear, since sometimes information on the farmers list is different from the information on the registration forms, and, with regard to yield estimates, the farmers lists contains some information that is not collected in any registration form (old or new version).

11.11: "Yields for last 3 years" are indicated but they are in fact not actual yields (because these are not known) but also rather rough yield estimates.

5.5 Internal Inspections

Brief Description of Internal Inspections (frequency, who?, average time/inspection)

Internal inspections have not yet started. As per present ICS manual, two internal inspection rounds are planned, one for May and one in autumn. The internal inspections will be done by Mr. Victor L. Mr. L. estimates that on an average day, 15-20 farmers can be inspected (extension is about 20 min per farmers, registration is about 30 minutes/farmer).

Evaluation

Since the internal inspections have not yet started the following compliance criteria have been checked with regard to the PLANNED procedures (acc. ICS manual and oral information). "n.c." means that the fulfilment of the requirement could not yet be verified but the planned procedures would ensure compliance.

	Compliance Criteria	Cat.	OK	PF	NF
7.1	100% of the registered growers are formally inspected each year by the ICS.	A	n.c.		
7.2	There is sufficient evidence that a physical internal inspection visit has actually taken place	A	n.c.		
7.3	The internal inspection includes a visit to the fields of the farmer as well as an interview with the farmer or his representative.	A		X	
7.4	The internal farm inspection includes a check of stores for inputs and final products as well as inspection of post-harvest handling facilities (if there are any)	B	X		
7.5	The internal inspections are thorough. All non-compliances with the internal organic standard have been duly identified.	A	n.c.		
7.6	The ICS has ensured that in cases of minor or major non-compliances appropriate corrective measures have been proposed (during or shortly after farm inspection) and communicated to the farmer.	B	n.c.		
7.7	The results of the internal inspection are in the internal inspection report and the report has been signed by the internal inspector.	A	n.c.		
7.8	The results of the internal control are confirmed by the farmer	B	n.c.		
8.1	There is a system to estimate yields and record these estimates for each farmer	B-C		X	
8.2	Yield estimates are reasonably accurate.	B-C		X	
8.3	Yield estimates are ready before harvest and are checked during purchase	B-C	n.c.		

7.3: In the procedures of internal inspections it is not explicitly stated that an interview with farmer is necessary and that the fields (and what part of the farmer's overall fields) need to be visited.

8.1&8.2: Yields were estimated (for 2003) based on number of plants, counting fruits in the fields, and interaction with farmer. The yields per plants of a certain age differ considerably from one farmer to another. Yield estimates per plant differ by more than factor 10 between different farmers, but this could still be a correct. Also the system of recording the yield estimates is confusing and not consistent in different documents. The field officer uses number of pineapples for his yield estimates, while the ICS Coordinator gave his estimates in kg. The system definitely needs to be a bit streamlined and used in a more harmonized way.

5.6 Training of Farmers and Farmer's Knowledge of Organic Production

Brief description of field extension and/or farmers training activities

CONSULTANT NAME2 has organized more than 6 farmers trainings in organic production for the Madeke farmers. Farmers seem to have attended the seminars well and were found to be well aware of the lessons. Trainings seem to have focused on erosion control, improved cultivation measures, and banning burning.

In addition, the field officers visit the farmers approximately once a month and discuss specific production problems with them.

Evaluation

	Compliance Criteria	Cat.	OK	PF	NF
13.1	Each farmer has received at least an initial advisory visit or initial training course on organic farming	C	X		
13.2	The participation and content of training is documented.	C	n.c.		
13.3	Farmers are aware of the certification requirements (internal organic standard)	B	X		
13.4	Farmers are familiar with appropriate organic farming methods.	C	X		

13.2: Training records could not be seen, but it was confirmed that they existed.

13.4 The trainings seem to have focused strongly on different crops and one farmer was found to argue that he had been told exactly what he would have to do about his pineapples, maize, and beans, but had received no rules for his sugar cane plot around the house. The issue was whether he would be allowed to burn the sugar cane after harvesting or not.

5.7 Internal Approval & Sanctions

Brief description of the approval system

According to the information from Mr. L., he and the field officer would decide together what to do in case of noncompliances. Mr. L. manages the farmers list, thus he can be somehow seen as approval manager at present.

Overview of non-compliances identified by the ICS this year and applied sanctions

No major noncompliances were identified as such since the beginning of the project, although in last season (before registration) some farmers still burned new fields for clearing the bushes/shrubs there.

Evaluation

	Compliance Criteria	Cat.	OK	PF	NF
9.1	There are procedures in place to approve or reject (sanction) farmers	C		X	
9.2	There is staff assigned to make approval/sanction decisions and this staff is qualified.	C		X	
9.3	The ICS sets the conversion status of each farmer as described in the ICS manual and according to the rules agreed with the certifier and in consideration of previous certification decisions of the certifier.	B			X
9.4	The farmers lists reflect the internal approval status for each farmer (i.e., differentiating between those that are approved organic, conversion, passive, suspended)	A			X
9.5	If medium or minor noncompliances have been identified by the internal inspection, appropriate measures have been taken to correct them.	B	N/A		
9.6	If major noncompliances have been identified, the ICS has taken appropriate corrective measures.	A	N/A		
9.7	If any organic produce that had already been bought as organic had to be de-certified, the ICS has followed up the product and taken appropriate corrective measures.	A	N/A		

9.1: Sanction procedures are outlined in ICS manual in rather general way; some more details on planned sanctions for the most relevant noncompliances would certainly help a consistent sanction policy. The ICS Manager was not yet really aware of the need to also “approve farmers”, or that in fact he would make an approval decision when, e.g., marking the farmers as organic on the farmers list, etc.

9.2. According to the opinion of the inspector, the present ICS Manager is qualified as an internal inspector, but not yet fully as an internal approval manager. Some further backup from more experienced staff from CONSULTANT NAME2 or Mr. WWW may be necessary and should possibly be formalized for important decisions. Also consistent data management is important for an approval manager and so far data has not been compiled systemically and consistently. Additionally, internal inspection and approval should in fact be separate functions; however, for some farmers, it will now be Mr. L. who does extension, internal inspection, and approval, which certainly is not a very objective control system. The present system can be accepted provisionally, considering the small size of the project, but in the medium term a better solution must be found.

9.3&9.4: The ICS operator was not able to do that before this first inspection. Clear rules for handling of conversion status will be defined between IMO and the ICS Operator. The following rules are proposed.

New farmers registered up to August in a calendar year, who have a confirmed and well checked history of not using any prohibited inputs, and who have received some training in organic farming can be registered in the year of registration as “in conversion last year”; they will therefore reach organic status in August of the following year.

5.8 ICS Personnel & Conflicts of Interests

	Compliance Criteria	Cat.	OK	PF	NF
11.2	Staff are aware of their duties and responsibilities	B-C	X		
11.3	There is a clearly defined person in charge of coordinating the ICS, organizing internal inspection and approval, and being a link with the organic certification body.	A	X		
11.4	The ICS has assigned at least one person to make approval & sanction decisions	B	X		
11.5	There is a sufficient number of internal inspectors to perform the 100% internal inspection each year.	B	X		
11.6	The internal inspectors are sufficiently qualified to perform a thorough and objective inspection.	B	X		
11.7	Each internal inspector receives at least one training per year. The participation and content of the training is documented.	C	X		
12.1	The ICS holds a conflict of interest declaration for each internal inspector and each member of the approval staff.	C			X
12.2	Conflicts of interests should have been sufficiently avoided. No inspector or approval staff has inspected/approved his/her own farm, nor the farm of his/her immediate neighbors, close friends or family	B	X		

	Compliance Criteria	Cat.	OK	PF	NF
12.3	If there have been conflicts of interest, the ICS must be able to show that no farmers have been given an unfair assessment or been disadvantaged by the internal inspector or by the internal process.	A	X		

11.3: There is an ICS “Supervisor” who acts in principle as an ICS Manager, but the linkage/involvement of PineappleprojectXXX in the ICS project is unclear and there seems to be rather little contact and interaction between the ICS project and the actual “ICS Operator” PineappleprojectXXX. Mr. L. acts at present more like an internal inspector than like a project manager, which also may be due to the fact that he took over the coordination only quite recently from Mr. WWW. Mr. L. is also only employed for 3 days (plus traveling) a months for all ICS work and lives far away also from PineappleprojectXXX Factory at Place AAA, so communication with factory is difficult and therefore management of the ICS manual (which also contains the processing procedures) remains tricky.

12.1: Form is included in ICS manual, but has not yet been signed.

6 Farm Production

6.1 Farm Unit and Part Conversion

Description	yes	no	n.r.	Comments
ICS Operator requires whole farm conversion	x			
Farmers also have non-organic crops (home consumption or local sales)		X		
Farmers have plots in different conversion status If yes: same crops in organic/conversion?		X		If yes: same crops in organic/conversion?

Most farmers grow the organic pineapple around their homestead where they also cultivate a couple of other crops organically. Some farmers also manage maize or beans fields nearby (1-5 km away), which are clearly within the project region and need to be considered in all ICS documents and also spot checked during internal inspections. Some farmers manage also maize fields in the lowlands, more than 20 km away. On these lowland plots, pineapple is never grown. These fields will be mentioned in the ICS documents but do not need to be considered in the internal inspection. According to all information available, all crops and plots (even those in lowlands) are grown without the use of prohibited inputs.

If there is part conversion:

	Control Point	OK	PF	NF	n.r.
15.1	There is no parallel production If there is: for what crops?/does project plan to market these products as organic?				x
15.2	There is sufficient separation between organic and non-organic fields				X
15.3	Conventional crops are not grown on the organic fields (e.g. intercropped)				X
15.4	There is sufficient separation of input storage				X
15.5	Sprayers are not used for non-organic and organic applications				X

6.2 Conversion Period

The application for certification of this project was submitted to IMO & Naturland in December 2003, and several months before that time the project (which was then in its first months of organizing and training the farmers) was already under supervision of CONSULTANT NAME2 and the status of things reported to IMO and Naturland.

The conversion period for pineapples is 36 months before harvest. The field history has been verified and crosschecked in detail. In view of the very low risk situation in the field and the findings of this inspection, which also confirmed that none of the participating farmers have used any prohibited inputs for many years if ever, it is proposed to set the official beginning of conversion for XXXXXXXX.

6.3 Overall Production System

	++	OK	-	n.r.	Comments
Crop Rotation (if applicable)			x		Basically no rotation of pineapples, fields are sometimes more than 15 years old and the quality of the pineapples is still very good and pest pressure very low. CONSULTANT NAME2 now promotes a diversified agroforestry system with intercropped trees but on many farms this process is only starting.
Intercropping		x			Some farmers have already some avocado or mango trees in their pineapple fields. Intercropping with maize and cassava is common in the year of planting.
Diversity		x			There is some diversity within the farms with regard to growing different crops, but most of all the farm plots are located in rather wild and natural surroundings and surrounded by hills of shrubs, bushes, and trees.
Soil Fertility Management		X	X		There are no fertilization activities, but pineapple is not very soil consuming. Soils are still very fertile in this region and have been shown not to deteriorate for a long time (under pineapple). Land is left fallow for several years before new planting. With the envisioned improved agroforestry system, mulching as well as use of legumes as green manure soil fertility could be sustained also in long term.
Soil Erosion Control		X	X		With rather steep hills and random planting of pineapples directly on the slope, erosion still is a problem, but several measures like contour planting of veveter, planting pineapples in contours, slashing rather than hoeing, etc., have already been started.
Pest and Disease Management		x			Due to natural environment there is not too much pest or disease pressure. Basically no activities. Pests do not seem to cause too much economical damaged and infested plants are simply removed or ignored. Some farmers seem to use natural remedies (a solution from a local plant tuber) against stalk borer in maize, the most relevant pest problem.
Weed Management		x			Hoeing by hand is practiced; hoeing is done towards end of raining season to minimize erosion, but slashing would even further decrease erosion
Sustainability of production system in general		X			

6.4 Fertilization

Description	Yes	No	Comments
Livestock manure used		X	Composted?
External inputs used for fertilization		X	If yes → give details below
Trace nutrients used in crop production		X	
Sewage sludge used on arable land		X	
Nutrient calculations are done		X	

	Product	Producer/Brand Name	Quantity (average)	Permitted?		
a	---	---	---	YES		NO*

6.5 Pest and Disease Management

Description	yes	no	Comments
External inputs used for pest and disease management		X	If yes → give details below
Homemade preparations used for pest and disease management		X	If yes → give details below

	Product	Producer/Brand Name Or app. Composition	Quantity	Permitted?	
				YES	NO*
a	---	---	---		

Some farmers in the region seem to use a local plant tuber against stalk borer, but use of the natural remedy has not been reported for any of the organic farmers in the project. Should be verified and documented during internal inspection (with botanical name of the tuber).

6.6 Seeds and Planting Material

	Crop (seed/plant)	Quality (organic, non-organic, treated)	GMO free	Details (treatment, origin, attempts to obtain organic propagation material)
a	Pineapple suckers	Organic	Ok	From own farms or fellow organic farmers
b	Maize seeds (common)	Organic or non-organic	Ok	From own farms or fellow organic farmers.
c	Cassava	Organic	Ok	From own farms or fellow organic farmers
d	Soybeans (rare)	Non-organic, untreated	?	From market (bought as soy for human or animal consumption, not from seed shop)

At present Tanzania officially does not allow any GMO crops. Food aid soy from the US (GM) is always milled before distribution. Thus the risk that the soybeans, which may be inter-cropped with the pineapples, are genetically modified is very low to negligible. Still, the seeds aspect needs to be monitored by the ICS.

6.7 Contamination

	Control Point	OK	PF	NF	N/A
16.1	There is no pesticide drift from neighboring farmers	X			
16.2	There is no risk of contamination by irrigation water	X			
16.3	Spraying equipment is used ONLY for organic treatments				X
16.4	There is no risk of contamination from malaria prevention programs or similar	X			
16.5	There is no risk of contamination from roads with heavy traffic or industrial pollution.	X			

6.8 Post Harvest Treatment (farm level)

Description of Harvest and Harvest period

Main harvest season: December to April, Short season: September
Harvest is done by manually cutting the pineapples.

Description of Post Harvest Processing and Processing Ratio

Fresh harvest on same day as purchase, piling up probably by border of road closest to the farm – collection by PineappleprojectXXX

	Control Point	OK	PF	NF	N/A
17.1	There is no risk of contamination during on-farm processing	x			

17.2	Only organic ingredients or permitted auxiliaries are used for processing				x
17.3	There is no risk of commingling with non-organic produce during post harvest processing	x			
17.4	There is no risk of contamination during storage of the organic products (on the farm)				x

7 Buying, Processing, and Handling

7.1 Buying and Handling

Description of Buying Procedures

Buying procedures in detail are not yet clear, but products will be collected from each farmer separately and products from different farmers will probably be combined into production lots.

A problem is the remote location of Madeke village and the bad road conditions especially during rainy season (Nov-May)

Evaluation

Based on roughly planned procedures and present level of understanding of ICS staff.

	Compliance Criteria	Cat.	OK	PF	NF
14.1	At delivery/buying points the organic status of the farmer is checked. Only the organic product of certified organic farmers is considered “organic product”.	A	X		
14.2	The verification of the organic status is done on basis of the certified farmers list (approved farmers list, confirmed by certifier)	A	X		
14.3	There is sufficient evidence that farmers only sell products from their own certified land	A	X		
14.4	The amount of product supplied is compared with the estimated yield. In cases of doubt, the product is kept separate until clarification is made.	B	X		
14.5	Deliveries/purchase are registered in a buying record, which states at least the date, the farmer’s code, delivered quantity (& product), and the organic quality.	A		X	
14.6	The farmer is issued a receipt, which indicates the farmer’s name (or code), delivered quantities, and organic quality	B	X		

14.5 It was not evident that ICS Supervisor was aware of this requirement.

Description of product flow after buying until export

Transport to PineappleprojectXXX factory – processing into cans, warehousing at factory – transport to Place ZZZ Warehouse – export by ship.

Evaluation of handling procedures in general

	Compliance Criteria	Cat.	OK	PF	NF
14.7	The organic product has to be kept separate from any product in conversion and any non-organic product at all times. The separation system must be clear.	A	X		
14.8	If in-conversion products are bought by the ICS for sale as “organic in conversion”, then these products have to be kept separate from all organic and non-organic (conventional) products at all times.	A	X		
14.9	During storage and transport the organic products must be labeled at all times as “organic”	B		x	
14.10	Organic warehouses must be labeled as “organic”. If non-organic and organic produce are stored unsealed in the same room, there has to be a clearly defined and well labeled, physically separated section of the room allocated to the organic produce.	B-C		x	
14.11	Both buying personnel and warehouse personnel are aware of the organic buying and handling rules. There is no major conflict of interest between organic product flow control and the income of the buying officer.	B			
14.12	There is no fumigation or irradiation/ionisation at any stage of the product flow	A	X		
14.13	Facility pest management is according to the applicable standard. The organic product is not contaminated.	A	X		
14.14	All central processing units where organic products are processed are subject to full processor inspection & certification by the organic certification body.	A	X		

Note: there has not yet been any handling of organic products, so the above evaluation is with reference to the present understanding of responsible staff and the planned procedures according to ICS manual.

14.9: It should be stressed again that also on all delivery notes (also from Njombe to factory) the loose pineapple are accompanied by a transport or collection document with clear indication of “organic”.

14.10: In the warehouse the tinned pineapples (organic label on each tin) are stored in cartons that are clearly labeled as organic. The chance of accidental mixing is very low, but it is still suggested to allocate a certain corner of storage to organic pineapple.

14.13: In the processing factory, the walls and doors are sprayed each Saturday with ICON against cockroaches, but every working day all equipment is cleaned with hot water and there is no risk of contamination. Thus, the procedures are ok for EU & Naturland, but for future NOP certification, the factory would have to further document what preventive measures and/or control measures with allowed pest control agents they have tried before spraying insecticide.

7.2 Processing (Central Processing Units)

Processing Unit (s)

The only place where pineapples (and therefore also all organic pineapples) are processed is the PineappleprojectXXX Factory at Place AAA.

Suppliers (all ingredients & Processing aids)

Supplier	Product(s) supplied	Certifier of supplier	Certification of supplier (per product if necessary)/date certificate (EU, NOP, etc.)
PineappleprojectXXX Organic Pineapple Outgrowers’ Project, Madeke	Fresh Pineapples	IMO	Under conversion until XXXX; no product certification yet

Brief summary of Processing Steps

Receiving pineapples – sorting – washing – peeling and sorting - cutting into slices – cutting out rings - filling rings in cans. Leftover pineapple pieces (same batch) are pulped and filtered. Pineapple juice is heated – filled into the cans with slices. Cans in exhaust machine (steam) – filled up with juice if necessary – sealed – pasteurized (length and exact temperature according pH of the batch) - cooling – intermediate storage in labeling room – labeling (batch number on label) and packing in cartons – storage of cartons until transport to Place ZZZ PineappleprojectXXX warehouse for export.

Brief summary of all measures taken to ensure separation

All production is strictly batch-wise; for pineapple, daily lots are planned (app. 3 t/day). The production date will be imprinted on every can. Additionally the batch number is written on each can’s label and on the carton. At present pineapples are not processed every day; on other days other PineappleprojectXXX products like tomato sauce or pickles are produced, so there is presently no chance of mixing different daily lots.

Furthermore the specific products—pineapple slices in natural juice and natural pineapple juice—will only be produced in organic quality.

	Control Point	OK	PF	NF
18.1	There is no risk of contamination during processing; machines are clean	x		
18.2	There is no risk of commingling with non-organic produce during processing		x	
18.3	There is no risk of contamination during storage of the organic products (in processing unit)		x	

18.2: If pineapples will be processed more frequently there remains a certain risk of mixing of pineapples before actual processing, e.g., an organic pineapple lot could remain unfinished one day (and the next day conventional pineapples arrive), and the procedures need to account also for such “exceptional” cases and how separation can be ensured if the organic (or conventional pineapples) need to be stored for a few days before actual processing. If less than the quantity bought in a certain day can be processed on one batch, this needs to be documented.

18.3: There remains a certain risk that different batches could accidentally be commingled during intermediate storage before labeling. Usually labeling is finalized within the day of production, and conventional pineapple may not even be processed the

same day, but it is still necessary to introduce a simple additional coding system (e.g., color strings) and a signboard “organic batch” to distinguish the organic products clearly from all other products before labeling.

Processed Products and Recipes

Product (specification)	Code	Processing ratio	Additional ingredients or processing aids	Organic Label Category
Pineapple slices in natural juice	PS	XXX% slices XXXX tins a 450g /t pineapple	None	Organic (EU) as soon as pineapples are certified organic.
Natural pineapple juice	PN	XXX% juice XXX tins at 450 g /t pineapple	None	

The processing ratio depends also strongly on size and quality of pineapples. Larger pineapples (app. 2 kg) can be processed in bigger rings and bigger cans (800g total weight). In this case processing ratios up to XXX% or even XXX% can be achieved. However for the organic products, only the smaller can size (450 g total weight) is planned to be produced, thus the processing rate of XXX-XXX% is taken as the basis until further details are known. The factory calculates with 15% overrun for the smaller size pineapples.

Out-turn from fresh pineapple: app. XX% slices and app. XX% juice. Ratio pineapple slices: pineapple juice in the tin is XXX. Each carton contains 12 tins.

7.3 Product Flow Documentation

Document	Content	Comments
Raw Material Book	First name of farmer, date, weight in, rejections (during reception)	For organic products, the full name of farmer and code number or reference to a buying list must be given
Production Record	Date, Product, full recipe with all ingredients and their respective quantities, total quantity produced (cartons)	Batch number is missing in production record, but it can be linked with batch number record via the production date. Final quantity is entered in production book only approx. once a month from the stock register information.
Batch Number Book	Production date, product, batch number, size of packaging (g, ml)	Kept in labeling room, done according to production date. Batch number is not also indicated on other products.
Store Register	Opening stock, date, item, gram specifications, receipts (daily in), total, daily out, damages, closing stock	A physical inventory is done every day. No indication of batch number, not known which batches are sold to whom.

With some small modification, the lot number system would be fully consistent and ensure the necessary traceability up to the point of exportport.

7.4 Product Flow Verification

Product & Period	Documents Used	Results	Comments
Pineapple slices in natural juice, 19.3.2004	Raw Material Book Production Record	19.3. in: 2515 kg pineapple 22.3. produced: 18 cartons at 450g tins = 216 tins x 300g slices/tin = 65 tins Processing Ratio: 2.5%	Processing is not always done on same day! This was an exceptionally bad lot, the first trial from Madeke, truck got stuck on road and the pineapples arrived in very bad condition
Pineapple slices in natural juice 5.4.2004	Raw Material Book Production Record Stock record (for final quantity)	5.4. in: 320 kg pineapple 5.4 produced: 11 cartons = 132 tins? 39.6 kg slices Processing Ratio: 12.3%	This was another small trial lot only.

If the any leftover pineapple juice from slice production will be used to produce organic pineapple juice, the remaining quantity of pineapple juice and the resulting production would have to be recorded separately.

8 Conclusions

8.1 Overall evaluation of the ICS

Since this was the very first inspection and the internal inspections had not even yet started, the efficiency of the ICS, etc., could not yet be evaluated. This needs to be done in detail during the external inspection in Oct. or Nov. 2004. However, the presently PLANNED system could already be evaluated. On this basis no certification can be recommended before next inspection, but several necessary corrective measures can already be given.

8.2 Compliance with previous conditions

none

8.3 Proposed Corrective Measures

Identified Noncompliance	Proposed corrective measure	Deadline
ICS manual does not yet reflect the actual procedures / situation	Further adapt the generic CONSULTANT NAME2 ICS manual to the specific project situation and outline in manual how you actually plan to deal with certain situations. Chapters that particularly need revision: Organization, ICS forms, all chapters from chapter 4 onwards.	Sept. 04
Risk assessment missing	Please prepare a complete risk assessment; at minimum, the present general risk assessment has to be replaced by the risks already identified.	Sept. 04
Staff not familiar with ICS manual	Staff must work with ICS manual and adapt the manual if necessary	continuously
Internal organic standard not yet complete	Please also include all requirements regarding organic planting material and seeds as well as the ban of burning in your producers contract.	Sept. 04
Registration data not yet complete	The following information needs to be corrected/updated for each farmer (preferably by using IMO field history form): <ul style="list-style-type: none"> - total farm area (in production region), list of all plots - register ALL fields under management of that farmer (plots outside project area can be mentioned separately) - field history & last inputs for "other crops" 	Sept. 04
Farm entrance form does not yet cover all relevant aspects	<ul style="list-style-type: none"> - indicate last inputs of prohibited inputs for other crops (e.g., like CONSULTANT NAME2 field history table in present ICS manual) - preferably complete a field history also for the pineapple fields - improve the commitment declaration by using at least the wording as in the CONSULTANT NAME2 farm entry form (in Swahili) 	May 2004 (before starting registration new farmers)
Internal inspection form does not yet cover all relevant aspects	<ul style="list-style-type: none"> - check of use of planting material and seeds must be included - it is recommended to also include soil erosion control and burning of crops more explicitly. 	May 2004 (before internal inspection)
Yield estimate system	The system to estimate yields and record these estimates has to be harmonized and standardized as much as possible.	Continuously
Farmers list	Farmers list has to be completed with total area, details on internal inspection etc, as outlined in compliance criteria 10.10 and 10.11	Sept. 04
Buying procedures not yet clear	Detailed buying procedures (as actually planned) need to be included in ICS manual	Sept. 04
Project management structure is vague	Kindly clarify the position of the smallholder group and the ICS management within the overall organization of PineappleprojectXXX, and clarify Pineapple projectXXX's actual involvement as ICS Operator. Also improved and closer communication between PineappleprojectXXX and the ICS Coordinator is very important.	Sept. 04

Additional comments or suggestions for improvements:

- Further training and support for ICS Manager, possibly having ICS management within PineappleprojectXXX, who coordinates the ICS field staff.
- Improved and more consistent handling of data and documentation in general

8.4 Certification Summary

→ Overview of certified farmers (total number of farmers in which status, total quantities, certified products)
(analogue IMO certification table)

Project site/no. of farmers	Product (s)	Quantity	Certification Status As per farmers list dated XXX
Madeke 54 farmers	Pineapples (fresh)	----	Not yet certified, beginning of conversion: 12/02

9 Appendices

IMO certified farmers list
Farmers re-inspection reports
PineappleprojectXXX ICS Manual, version 14.4.2004
2 sample farm entry forms
Handwritten farmers list as presented during inspection

I. Appendix 5: Examples of Risk Assessment Results

-collected during a pilot training in India-

Note: during the training an older version of the risk assessment checklist was used.

Potential Risks for Spices

Many crops, smallholdings, many holdings – high number of risks

- Cardamom is a problematic crop, mainly for pest control. Other crops are ok to grow organically. Rubber, sometimes fertilizers used.
- Harvest of pepper, some insecticide against ants
- Parallel production in extended family is a risk. May be common storage for products, etc.
- Deforestation may be a problem.
- Fraud may be seen as an achievement
- Quick increase of project size may be a problem
- Conflicts of interest could be a problem because inspectors are generally from the same area
- When prices are high there is an incentive to sell other farmers' crops as organic.
- Possibly the ICS other crops growing on the organic plot. This might be a particular problem focuses only on its organic cash crops (the crops that shall be certified) and misses out to check also the organic cultivation of the if the intercropped other crops are "high-risk" crops, i.e. crops which are commonly grown with chemicals (or treated seeds) in the project region

Potential Risks for Fruit Pulp Producers

- Rented out space is within the organic unit
- Most fruit crops are not high risk crops, but non-organic farmers may still use prohibited inputs
- Medium to easy access to prohibited inputs
- Some chance that some farmers have used chemicals on the organic crops from time to time
- Extended family
- ICS staff may change rather frequently
- Farmers may sell non-organic crops
- Pineapple: flowering agents
- Buying agents: sometimes commission-based, has a certain target to meet – high incentive to cheat. In an Indian system this is generally not so much of a problem.
- Leased lands: tenant may use some inputs without the farmer being responsible

Potential Risks for Cotton

- Crop is typically grown with chemicals / difficult to grow organically. Cotton is known as an intense input crop.
- Easy access to prohibited inputs
- Cotton will be grown by most neighbors with chemicals.
- Cotton farmers are convinced of organic farming and after the first year there is usually no problem with use of prohibited inputs
- Farmers only declare a few plots, but also grow cotton on undeclared plots – problem of parallel production!
- GM seed – sometimes neighbors growing GM cotton may even be a problem. Farmers will not use the GM seeds

themselves because it is easy to identify. Price of GMO cotton seeds is 3x higher – it is a conscious decision.

- It is very important that all land is declared. A problem is that only cotton is bought, so farmers only want to give information and convert the cotton fields, but not necessarily the other crops.
- In some region farmer regularly change fields, take over new plots. If irrigated batch of land – no shifting from one plot to the other. If rain-fed more of a problem. Renting of land is not common, only shifting.
- High pressure from agrochemical traders.
- Rotation crops may be farmed conventionally – ICS must also focus on the other rotation crops.
- Contamination may also take place at ginning also with GM cotton.

Potential Risk Area	Identified potential risk (yes/no)		Evaluation of risk and prevention of the risk by project
	Y	N	
Organic Crop	x		Crop is typically grown with chemicals, difficult to grow organically
			Not a traditional product in the area, farmers not familiar with production
Production Area	X		Easy access to prohibited inputs
	X		Other farmers in the village/area grow the same crop with prohibited inputs
Farmers			Farmers not very aware of organic production methods
	X		(double weighing) Farmers have been found to use prohibited inputs on organic plots.
			Farmers not really convinced of organic farming
	X		Farmers also grow non-organic crops.
	X		Risk of parallel production in “extended family”
			Low social control among members

Potential Risk Area	Identified potential risk (yes/no)		Evaluation of risk and prevention of the risk by project
	Y	N	
		Uncertain land rights or fields changing regularly	
		Low level of general compliance with rules/legislation, region where fraud is seen as achievement	
Project Organization		ICS staff not sufficiently qualified for efficient control	
		ICS does not have sufficient staff or lacks means of effective control	
		The smallholder group's size or activities have changed considerably.	
		Responsible ICS staff has changed	
		Insufficient prevention of conflicts of interest	
		Yield estimate system and buying procedures in general do not necessarily prevent farmers from selling produce of their neighbors	
	X	Price difference between organic and non-organic is very high	
ICS Quality and Efficiency		<i>(double weighting)</i> ICS still not very well developed, formal deficiencies regarding some requirements (but no major differences between findings of internal and external control)	
		ICS has failed to detect minor non-compliances (not threatening the organic integrity of product)	
		<i>(double weighting)</i> ICS has failed to detect major non-compliances → <i>always highest risk category</i>	
Sum of identified risk points:			

Overall Risk Evaluation and Risk Categorization:

	Low risk
	Medium Risk
X	High risk

Potential Risks for Rice

- A good ICS is crucial! sufficient infrastructure & qualified personnel
- Paddy is grown in submerged conditions – chances of drift are very high and often even impossible to control – very important that the right group(s) of farmers are selected with continuous cropping areas, choosing farmers uphill rather than downhill.
- ICS only focuses in training & control of rice. If wheat yields go down by 50%, there is a high risk that wheat will be grown conventionally – farmer might drop out of organic rice production because cannot manage the wheat organically. Risk that ICS does not check other crops properly.
- Large lands – risk of parallel production, not all areas are cultivated organically. New areas are included each year. Also problem of different conversion status within the same farm – major problem of separation.
- More risk of cheating on project sites. Adjusting the quantity by buying conversion crops and selling as organic – will always have very high yield estimates.
- Purchase procedures – subject to tax – project may buy through dealers – clear risk of mixing is there.



INTERNATIONAL FEDERATION OF
ORGANIC AGRICULTURE MOVEMENTS

SMALLHOLDER GROUP CERTIFICATION

GUIDANCE MANUAL FOR PRODUCER ORGANIZATIONS

REVISED IFOAM PRODUCER MANUAL FOR SETTING UP AND
HARMONIZING AN INTERNAL CONTROL SYSTEM (ICS)

MAY 2004

FLORENTINE LECHLEITNER (IMO), UTE EISENLOHR (IMO)

This Guidance Manual was commissioned by IFOAM and funded through the program IFOAM – Growing Organic (I-GO) whose aim is to strengthen the organic agriculture movement in developing countries.

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The project was coordinated by Florentine Lechleitner (IMO) and the following experts contributed to the ICS Guidance Manual and the Training Curriculum: Ute Eisenlohr (IMO), Franz Augstburger (IMO Caribe), Chris May (Bioglobal), Gerald Herrmann (Organic Services), Michiel Schoenmakers and Bo van Elzakker (Agro Eco).

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Principles of Organic Agriculture

Preamble

These Principles are the roots from which organic agriculture grows and develops. They express the contribution that organic agriculture can make to the world, and a vision to improve all agriculture in a global context.

Agriculture is one of humankind's most basic activities because all people need to nourish themselves daily. History, culture and community values are embedded in agriculture. The Principles apply to agriculture in the broadest sense, including the way people tend soils, water, plants and animals in order to produce, prepare and distribute food and other goods. They concern the way people interact with living landscapes, relate to one another and shape the legacy of future generations.

The Principles of Organic Agriculture serve to inspire the organic movement in its full diversity. They guide IFOAM's development of positions, programs and standards. Furthermore, they are presented with a vision of their world-wide adoption.

Organic agriculture is based on:

- The principle of health
- The principle of ecology
- The principle of fairness
- The principle of care

Each principle is articulated through a statement followed by an explanation. The principles are to be used as a whole. They are composed as ethical principles to inspire action.

Principle of health

Organic Agriculture should sustain and enhance the health of soil, plant, animal, human and planet as one and indivisible.

This principle points out that the health of individuals and communities cannot be separated from the health of ecosystems - healthy soils produce healthy crops that foster the health of animals and people.

Health is the wholeness and integrity of living systems. It is not simply the absence of illness, but the maintenance of physical, mental, social and ecological well-being. Immunity, resilience and regeneration are key characteristics of health.

The role of organic agriculture, whether in farming, processing, distribution, or consumption, is to sustain and enhance the health of ecosystems and organisms from the smallest in the soil to human beings. In particular, organic agriculture is intended to produce high quality, nutritious food that contributes to preventive health care and well-being. In view of this

it should avoid the use of fertilizers, pesticides, animal drugs and food additives that may have adverse health effects.

Principle of ecology

Organic Agriculture should be based on living ecological systems and cycles, work with them, emulate them and help sustain them.

This principle roots organic agriculture within living ecological systems. It states that production is to be based on ecological processes, and recycling. Nourishment and well-being are achieved through the ecology of the specific production environment. For example, in the case of crops this is the living soil; for animals it is the farm ecosystem; for fish and marine organisms, the aquatic environment.

Organic farming, pastoral and wild harvest systems should fit the cycles and ecological balances in nature. These cycles are universal but their operation is site-specific. Organic management must be adapted to local conditions, ecology, culture and scale. Inputs should be reduced by reuse, recycling and efficient management of materials and energy in order to maintain and improve environmental quality and conserve resources.

Organic agriculture should attain ecological balance through the design of farming systems, establishment of habitats and maintenance of genetic and agricultural diversity. Those who produce, process, trade, or consume organic products should protect and benefit the common environment including landscapes, climate, habitats, biodiversity, air and water.

Principle of fairness

Organic Agriculture should build on relationships that ensure fairness with regard to the common environment and life opportunities

Fairness is characterized by equity, respect, justice and stewardship of the shared world, both among people and in their relations to other living beings.

This principle emphasizes that those involved in organic agriculture should conduct human relationships in a manner that ensures fairness at all levels and to all parties – farmers, workers, processors, distributors, traders and consumers. Organic agriculture should provide everyone involved with a good quality of life, and contribute to food sovereignty and reduction of poverty. It aims to produce a sufficient supply of good quality food and other products.

This principle insists that animals should be provided with the conditions and opportunities of life that accord with their physiology, natural behavior and well-being.

Natural and environmental resources that are used for production and consumption should be managed in a way that is socially and ecologically just and should be held in trust for future generations. Fairness requires systems of production, distribution and trade that are open and equitable and account for real environmental and social costs.

Principle of care

Organic Agriculture should be managed in a precautionary and responsible manner to protect the health and well-being of current and future generations and the environment.

Organic agriculture is a living and dynamic system that responds to internal and external demands and conditions. Practitioners of organic agriculture can enhance efficiency and increase productivity, but this should not be at the risk of jeopardizing health and well-being. Consequently, new technologies need to be assessed and existing methods reviewed. Given the incomplete understanding of ecosystems and agriculture, care must be taken.

This principle states that precaution and responsibility are the key concerns in management, development and technology choices in organic agriculture. Science is necessary to ensure that organic agriculture is healthy, safe and ecologically sound. However, scientific knowledge alone is not sufficient. Practical experience, accumulated wisdom and traditional and indigenous knowledge offer valid solutions, tested by time. Organic agriculture should prevent significant risks by adopting appropriate technologies and rejecting unpredictable ones, such as genetic engineering. Decisions should reflect the values and needs of all who might be affected, through transparent and participatory processes.

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Preface

This manual applies to smallholder organizations (farmers co-operatives, farmers contracted by exporter or NGO, other forms of farmers associations) who wish to apply for organic certification as a group.

It can be used

- a) by as yet uncertified smallholder organizations as a guideline how to set up an Internal Control System (ICS) and related measures for organic certification
- b) by already certified organic smallholder organizations as a basic document for evaluation of their existing ICS and identification of aspects of their ICS that might need to be revised in order to streamline their system with the new harmonized IFOAM ICS approach as presented in this manual.

The Manual is presented in three parts:

- A. General introduction to smallholder certification and internal control systems
- B. Core parts of an internal control system (presented as chapters of an internal ICS manual)
- C. Additional components of an ICS: procedures like purchase, processing, storage, etc., which may also lie under the responsibility of the ICS operator and which need to be defined and documented, but which are not, strictly spoken, part of the ICS. Usually these aspects are also described in the internal ICS manual.

Each chapter in Part B and C of this guidance manual contains the following information:

MINIMUM REQUIREMENTS: these are minimum requirements for the ICS; i.e. in principle, they must be implemented for organic certification. If certain particular requirements can only be implemented gradually, it is still up to overall assessment of the organic certifier to assess whether organic certification can be granted
* Minimum requirements with a * must already be fulfilled at the first inspection.

Comments and Suggestions: In this section some comments and suggestions for the respective chapter are given. This may include examples of procedures that have already proven to work well or explanations regarding the background of a certain minimum requirement.

Sample Text ICS Document: As an illustration how an ICS manual could look like, a sample ICS text is written for each chapter. The example chosen is the ICS of a typical coffee cooperative in Latin America. Obviously the sample is meant as an illustration only and can be adapted by the ICS operator as needed, but always with regard to the applicable minimum requirements.

Part A: Introduction Smallholder Certification

0.1 Introduction to Smallholder Certification on basis of ICS

The organic market is regulated by various organic standards and regulations; i.e., in most countries worldwide, all production steps of a product that shall be marketed as “organic” need to fulfill certain defined criteria for organic production. Compliance with these rules has to be inspected and certified by an organic certification body.

On the other hand, a majority of agriculture practitioners worldwide are smallholders and are often located in remote areas with long travel times from one place to another. Furthermore, the overall revenue from their agricultural production is usually far too small to allow a viable farm inspection by some external inspection body for each farmer.

For these reasons, since 15 years ago, long before government regulations were introduced, smallholders in developing countries in co-operation with certification bodies have developed systems to assure compliance with organic standards for producers as a group. Different strategies of quality assurance systems of smallholder groups have developed over time with respect to the nature and size of the operation, ranging from tens to thousands of individual producers.

As a consequence requirements regarding smallholder group certification and the duties of the Internal Control System (ICS) differed considerably between different organic certifiers.

Smallholder groups certification implies that there is:

- A central body responsible for ensuring the group’s compliance with applicable standards. This can be a self-organized cooperative/farmers association or simply a buyer or processor who contracts farmers (“contract production”).
- Group Certification for all small farms as well as processing and handling activities registered within the group. Individual operators within the group may not use the certification independently.
- Group members operate under contractual or binding membership requirements specifying the commitment to comply with applicable organic standards and permit inspection, etc.
- The ICS maintains files on all members of the group and inspects each member’s operation at least once a year. A list of all individual member producers is available. The group through the ICS mechanism decides on members’ compliance with applicable standards. Non-compliances are dealt with according to set procedures and sanctions.
(from IFOAM’s Position on Smallholder Group Certification for Organic Production and Processing)

As a result of a three-year harmonization process with annual workshops at the Biofach, as well as two larger IFOAM projects regarding smallholder group certification, this manual now comprises an up-to-date and harmonized set of criteria regarding group certification

and Internal Control Systems. The new EU position paper on smallholder group certification has also been taken into account.

The criteria for certification of ICS is laid down in the IFOAM Accreditation Criteria (AC) - chapter 8.3 with guidance. The outcome of the three smallholder workshops specified the procedures in much more detail than would be appropriate for accreditation criteria. The IFOAM criteria were taken into account in the workshops and similarly the results of the workshops were reviewed in the revision of the criteria.

0.2 Who is eligible for group certification?

Smallholder farmer organizations of different types are eligible for group certification. The most common types of smallholder projects are:

- 1) Farmers Groups: an association or cooperative of farmers holds the organic certificate and organizes the ICS (is the ICS operator)



- 2) Contract Production: a trader or processor who is contracting small farmers holds the certificate and organizes the ICS (is the ICS operator)



Remark: In some cases the ICS operator does not own the certification because the certification is paid by somebody else, e.g., by a trading partner in Europe.

For smallholder group certification the following conditions must be fulfilled:

- The cost of individual certification is disproportionately high in relation to the sales value of the product sold. Farm units are mainly managed by family labor.
- There is homogeneity of members in terms of geographical locations, production system, size of holding, common marketing system.
- In principle only small farmers can be members of the group covered by group certification. Larger farms (i.e., farms bearing an external certification cost that is lower than 2% of their sales) can also belong to the group but must be inspected annually by the external inspection body. Processors and exporters can be part of the structure of the group but have to be inspected annually by the external inspection body. (see *new ICS Guidance Document EU Commission 6.11.2003*)

For more details on the long discussions regarding this issue refer to the IFOAM Smallholder Group Certification – Compilation of Results

0.3 What is an ICS?

IFOAM definition: An Internal Control System (ICS) is a documented quality assurance system that allows an external certification body to delegate the annual inspection of individual group members to an identified body/unit within the certified operator.

This means in practice that a growers group basically controls all farmers for compliance with organic production rules according to defined procedures. The organic certification body then mainly evaluates whether the Internal Control System is working well and efficiently. The evaluation is done by checking the ICS documentation system and staff qualifications and re-inspecting some farmers.

The details of such a quality assurance system are described in detail in this manual. Some of the formal requirements (documentation, clearly defined procedures) result from the requirements of the organic regulations that always include “control requirements” in addition to “production requirements”.

0.4 How to develop a suitable ICS

This manual serves as a guideline of what is expected of a documented Internal Control System (ICS). It can be used in the process of setting up and developing the ICS and the internal ICS manual for a specific group of smallholder farmers. Although the sample texts and the comments in this manual can be used as a basis, the ICS still needs to be adapted at least in some details to the unique situation of each smallholder project.

More detailed instructions on how to actually set up an ICS are included in the IFOAM Training Manual entitled “Smallholder Group Certification: Training Curriculum for producer organizations”.

The basic steps are:

- Find qualified personnel and make sure they receive the necessary training in organic production and ICS development (e.g. with help of the above-named manual).
- Identify farmers. If farmers are not yet familiar with organic principles, awareness creation may be necessary
- Start developing adapted and suitable ICS forms and (preferably written) procedures with the guidance of this manual. The final ICS manual can initially be a fairly simple document. It is more important that the procedures and forms are actually implemented and understood by all staff than that the manual contains details on every eventuality right from the beginning.
- In order to help with selecting the very minimum ICS requirements that should already be implemented before the first inspection, these requirements are indicated with a *.

- Either before or during the first inspection, the organic certification body must screen and assess the ICS document and most likely offer some comments or conditions for improvement.
- Gradually improve the ICS document (procedures, forms, etc.) and its implementation by the ICS staff.

Part B: The Internal ICS Manual (Core Part)

Organizations that are to be certified on basis of an ICS are expected to present an internal ICS manual. The second (B) and third part (C) of the guidance manual are written as far as possible like a real internal ICS manual; i.e., an organization could take this guidance manual, leave out all minimum requirements (gray text boxes) and tips (white text boxes) and adapt the sample texts according to their situation (but always with consideration to the minimum requirements). This approach will result in a complete internal ICS manual.

The content of the manual (which to organize in the manual text, what to put in the annex, structure, etc.) may of course be modified according to the needs of the user.

In established ICS the external certification body will check whether the ICS manual meets all relevant criteria, independent from how the group decided to structure its manual.

1 Distribution & Update Management of ICS Manual

It is of key importance that the ICS policies and procedures are known to all involved, including the farmers. Therefore it is important to establish transparent document management ensuring that the internal ICS manual is always up to date and all relevant parts distributed to all parties.

1.1 Distribution of the internal ICS manual

Policy: All relevant parts of the ICS manual and descriptions of ICS procedures must be made available in appropriate form to the persons responsible for implementing the respective requirements or procedure. Farmers should have access to the manual.

1. The complete internal ICS manual must be distributed to the members of the Organic Approval Committee and/or the Organic Approval Manager as well as to the internal inspectors.
2. The full internal ICS manual shall also be made available upon request to farmers and associated organizations/operators which are part of the organic project.

It is recommended that the top management is involved as much as possible in the ICS procedures and also has to approve the ICS manual.

This complete ICS manual is made available to:

- general management
- members of Organic Approval Committee
- internal inspectors and field support staff (extension staff)

Copies of the complete document are kept at the village project centers for access by interested farmers.

The following parts of the ICS manual are also distributed to:

- farmers: internal organic standard (farmers also receive a cartoon summary of the production rules)
- contracted processor <name processor>: internal processing standard and handling and processing procedures:
- purchase officers: buying procedures and forms

The ICS manual can only be changed with approval of the general manager.

1.2 Improvement and updating of the ICS manual

Policy: The ICS manual shall reflect the reality of the ICS and current requirements of the certification standard.

1. The ICS manual needs to be reviewed on a regular basis as updated when necessary.
2. Changes are communicated to all staff concerned (see chapter distribution).

Internal management review, changes in the external certification standard, findings of the organic project personnel or technical support advisors, results of the annual report by the Organic Approval Committee/Organic Certification Manager, and findings of the external inspector may lead to revisions of the internal standards, procedures, and forms and consequently serve to improve the quality of the ICS. The ICS manual shall reflect the reality of procedures and therefore it is important that regularly, e.g., once a year the ICS coordinator sit down and discuss with all parties involved what should be changed in procedures, in forms, etc., for the coming year in order to continuously improve the system and best adapt it to the needs of its users. If substantial changes are made it is recommended to send the manual to the external certifier for approval before the implementation starts. If it can be done, it is recommended to rather choose a general revision time at the beginning of the new inspection season than to change something in the ICS Manual every month. It is very important that the ICS staff is aware of important changes; therefore it is highly recommended to specifically address changes in procedures and documents in staff trainings.

This ICS manual is updated when required (e.g., if the certification standard changes or if procedures are not working well). At least once a year before the beginning of the new <coffee> season in <February>, the ICS manual is reviewed and modified when changes are required (document receives a new version each year, e.g., "2004").

Changes in the ICS manual are approved by the management (chairman of cooperative and organic coordinator). The ICS coordinator is responsible for distributing the updated procedures and forms after the changes to all parties. When changes are made, a complete new version of the ICS manual is distributed to all affected parties (see chapter availability) at least once a year. It is the responsibility of the ICS coordinator to ensure that all concerned personnel receive notification of which sections of the ICS manual have been changed. He/she shall ensure that all staff members are aware which forms/procedures are valid and that they are aware of the changes.

2 Brief Description of Structure & Activities

2.1 Overview of farms

Policy: The internal ICS manual contains a basic description of the organic project.
*1. An overview on the organic project sites must be given.
2. A general overview on the farming system and agricultural practices of participating farmers is needed.

Ad 1: An organic project site could be, e.g., a group of farmers in the same region with similar characteristics or a group of farmers who are organized in separate internal control units.

Ad. 2: A smallholder group needs to fulfill certain criteria (e.g., regarding homogeneity of farmers, size/economic power of producers) in order to permit certification based on an ICS system. The final decision of whether smallholder certification is possible is made by the certifier considering the criteria as outlined in the IFOAM-ICS Compilation of Results. As a basis for the evaluation by the certifier, as well as for an internal overview of the organic project, a description of its structure must be available. This document needs to include the structure and size of the farms (average, minimum, and maximum size), cultivated crops and farming methods which are at present practiced by the farmers (if necessary distinguish between farmers groups located in different areas). Describe the most intensive as well as the most extensive farm management.

Overview <organization AAA> project sites:

Name of project site (regional chief internal inspector)	Villages	N° organic farmers
Río Blanco (Carlos Morales)	San Juan Villa Rica	134
San Martín (Pedro Juarez)	El Progreso La Marvilla	94
Montaña Azul (Juan Real)	Belo Horizonte Flor de Mayo	56

The farmers typically own 5-7 ha of land. The average area under coffee is between 4-6 ha per farmer. The smallest farmer has 0,5 ha of coffee and the biggest has 12 ha under coffee. Generally farmers in Rio Blanco and San Martin tend to be rather small, while the bigger farms are rather located in Montana Azul. Most of the farmers cultivate between 0.5-1.0 ha of home consumption crops (maize and beans), a few have livestock (Montan Azul Region). Coffee in all project regions is traditionally produced without any agrochemicals. Some producers use compost for fertilization which is made from the dung of own animals. Most of the farmers still use some chemical fertilizers (urea) in their maize production. The farms are managed mainly by family members with the help of seasonal workers during harvest period. Farmers sell most of their coffee to the <organization AAA>, but also to local traders.

2.2 Overview buying, handling and exports

Policy: The Internal ICS manual contains a basic description of the organic project.

*1. There must be a description of all the steps that take place from harvest until the final sale of the product to another entity, including indication of whose responsibility the product is under at each step.

As a first overview of the organic product flow (that normally has to be supervised by the ICS and in all cases by the organic certification body), a short description/illustration is needed of the buying process, purchase centers, transport, how and where storage takes place, processing, packing / re-packing.

For new organizations the originally planned procedures as described in the manual might need to be changed to fulfill the requirements for ICS certification, as outlined in this manual. Therefore a revision of this description may be necessary in order to describe the new situation after having implemented changes in the product flow organization. Detailed procedures for buying and handling are described in chapter 5.

<Coffee> is harvested by the farmer, wet-processed on his farm and dried on mats. The <coffee> is then brought in bags to the purchase center. <Coffee> is bought by <organization AAA> in <three> purchase centers. In each center, drying areas are available, where the product is dried immediately after reception, if necessary and packed in bags of the organization. Each Friday the collected products are transported from the purchase center in hired lorries to the central warehouse of the <organization AAA>. -From there, all coffee bags are transported to the processing plant <processing plant BBB> for dry processing. After processing the <coffee> is packed in final export bags and then sent directly back to the central warehouse where it is stored until export. From the moment of purchase from the farmer until export the <coffee> is owned by <organization AAA>.

3 Risk Management

3.1 Basic Risk Assessment

Policy: Risks which might jeopardize the organic product quality at the different levels of farm production, transport and storing, processing and export must be known and taken into account in all internal control procedures.

*1. A detailed initial risk assessment must be completed once.

2. The risk assessment has to identify risks on the farm level as well as during buying, processing or (export) transporting, as far as the product is under responsibility of the ICS operator.

3. The ICS takes all measures to minimize the identified relevant risks.

Ad. 3 It will be evaluated whether all risk aspects are checked sufficiently by the ICS and appropriate countermeasures are taken. E.g., if there is a reasonable chance that farmers will sell produce of their neighbors/family the risk could be counteracted by a) registering all neighbors and family members; b) preparing a very thorough estimate of yields immediately before harvest, rigorously checking delivered quantities, plus spot checking by

an internal inspector during harvest period; c) buying only the produce that have been harvested in presence of project purchase staff themselves. In the IFOAM document “Smallholder Group Certification -Compilation of Results”, there is a long list of potential risks given.

Three examples of an organic risk assessment are included in the Annex

- Coffee cooperative (“low-risk”: simple mixed cropping system): Annex I
- Banana Project (“high risk”) Annex II

3.2 Critical Control Points and Continuous Risk Management

The initial risk assessment is the very first step toward raising awareness of critical aspects to be tackled in the ICS. It is recommended to repeat the risk analysis exercise regularly to be aware which of the previously identified risks might still be jeopardizing the organic quality and what are the most important risks at present (will always be changing). Example: while in an initial risk assessment the main focus will be on farm production and potential risk that farmers sell non-organic crop), in the following year the risk may be more on the ICS side: not enough staff to finalize 100% inspection, quick turnover of staff so that new staff is perhaps too inexperienced, etc.

An ICS operator should always be aware of the current main critical control points in order to take appropriate preventive measures in his overall risk management.

4 Internal Organic Standard

4.1 Scope of certification

1. All organic regulations or standards according to which certification is requested need to be listed in the internal standard or the internal ICS manual.

Depending on the targeted organic market official organic regulations must be complied with, e.g., EU-Regulation 2092/91, National Organic Program NOP US, JAS Japan. Additionally other (private) organic standards may facilitate the market access, or may be requested by the buyer (e.g. Naturland, Soil Association, Bio Suisse, etc.). An overview of the requirements of different organic regulations and private standards is given in annex IV-VI)

<Organization AAA> is working according to the following regulations:

- EU-Regulation 2092/91 (all farmers)
- USDA NOP Standard (all farmers)

4.2 Internal Organic Standard

Policy: The internal organic standard is the reference standard for the internal control.

1. The internal organic standard must include the farm production requirements of the relevant external organic regulations/standards as far as these requirements are important and relevant for the organic activities. It shall also include the necessary production rules to ensure truly sustainable and organic farming.
2. It must be presented in an adequate form, according to the knowledge of the ICS staff.
3. The requirements of the internal standard (and practical implications for the farmer) must be communicated clearly to all farmers in local language.
4. The internal organic standard shall address the following topics:
 - What units/crops are under organic management and certification plus how to deal with part conversion (i.e. if farmers still grow some non-organic crops as well)
 - Conversion period
 - Farm production rules for the whole organic production unit (e.g., seeds, fertilization and sustainable soil management, plant-protection, approved inputs, prevention of drift, livestock husbandry)
 - Harvest and post-harvest procedures

Ad 1 The internal organic standard is written by the ICS operator for the specific local situation of the organic project but under consideration of all applicable certification regulations and applicable private standards. It should also include all the active farm management methods necessary for truly sustainable and organic farming. The most important requirements of important international organic regulations (EU-Regulation on organic farming N° 2092/91, NOP Standard) are summarized in Annex IV and V of this manual. In some aspects the ICS operator may decide to be stricter than the minimum requirements of these standards. Some requirements of the standard (e.g. conditions in case of parallel production) may not be necessary in the internal organic standard (e.g. if all farmers have only organic crops).

E.g.. it is recommended to not simply include the whole list of permitted products for fertilization and pest control that is defined in the external organic regulation, but reduce the list of allowed inputs to only those products which are really necessary and known to the producers.

Please note that the external organic regulations/standards are regularly subject to changes (see chapter 1.2).

Ad 3 Usually a summary of the organic internal standard is given to farmers as an annex to the contract, or the most important requirements are simply listed in the farmers contract. For communication of the most important aspects to the farmers it may be a good idea to include illustrations in addition to text. If farmers are illiterate, the certifier may require a description of procedures on how the farmers can still have access to and understanding of the internal standard (e.g. illustration of standards).

Two examples for an internal organic standard are included in the annex:

- Coffee cooperative (“low-risk”: simple mixed cropping system): Annex VII
- Banana Project (“high risk” farmer with non-organic vegetable plots and extension of the cash crop to new fields) Annex VIII

5 Farm Control and Approval Procedures

5.1 Registration of new farmers

Policy: All farmers that shall be certified need to be formally registered as organic farmers.

- *1. For each farmer the total area under his/her management (including non-organic fields), the organic crops with area (or number of plants/trees in mixed cropping) and his/her basic farming methods need to be recorded in a Farm Entrance Form (farm data sheet). For each farm the date of last application of prohibited inputs is recorded.
2. A commitment declaration (contract) must be signed between each farmer and the ICS operator in a language understood by the farmer. The contract must contain commitments to fulfill the internal organic standard. The consequences of violation of the contract must be clear (sanction policy). It must also grant permission for internal and external inspectors to inspect farms and farmer records. The contract shall also be available in the language of communication with the certifier.
3. An overview map (village or community map) must be provided showing where each organic farm is located.
An up-to-date map showing at least the fields of each farmer must be available in the following cases:
 - farms with annual organic export crops in rotation,
 - organic farms in an area with high chemical input (and thus high risk of drift)
 - when non-organic crops are grown by the organic farmer
4. If the farm data changes considerably, a new form entrance form/basic far data sheet must be completed, or the data in the farm file updated in update forms or similar.

Ad. 1 The registration of new organic farmers is very important and must be taken seriously by the internal control. The previous farming practices and the previous use of inputs have to be investigated thoroughly. Also good basic data on the farmer (e.g. number of trees) helps in all following years for good supervision and exact yield estimates, etc. An example for a Farm Entrance Form is included in Annex XII. The registration visit usually does NOT count as first internal inspection. The internal inspection should be done after the registration visit.

Ad 2 The contract should contain information on how long it remains valid and how it can be cancelled. Contracts are often made as “contracts for life”, however in certain cases it may be a better option to renew contracts periodically (e.g., every 3 years). Often in the contract production rules that the farmer has to follow are described or reference is made to the (summary of) the internal organic standard as an annex to the contract. Often some additional explicit requirements, such as “the farmer is not allowed to market any produce of his friends, neighbors and family” are added to ensure that the farmer really knows what is expected from him. An example of a contract is included in Annex IX

Ad. 3 The overview maps shall provide the external inspector with sufficient information to locate each farm. It may be preferable to have one map for each village; for each production zone there might be a need for an overall overview map indicating the different villages. The maps should therefore indicate villages, roads and tracks, trading centers,

specific landmarks. The map should be dated. An example is included in Annex X. Where necessary and feasible, maps can be made using Global Positioning System (GPS). In addition to overview maps it is recommended (even if not always compulsory) to have a field map for each farmer for complete overview on the farmer's fields and plots (e.g., defined plot numbers for each plot that then can be used in all checklists, etc.). A map may also be the best way to document the different crops grown on the farm and indicate potential areas of drift. For farms with rotating organic export crops it may be a good idea to have one farm map with only the sketch of all fields and copy this field map several times. Then, each time an update map is done, this simple standard map is used to indicate the actual plots and crops within these plots. Maps of neighboring farmers can be combined as long as the fields with the crops can still be identified. In some cases a large and detailed village map may also be appropriate to indicate all fields of the farmer and would therefore be sufficient. A sample farmer's field map is included in Annex XI

Ad 4: considerable changes would be for example the buying of new plots/selling of plots. After a couple of years, it might any make sense to collect all farm data correctly again (esp. if new crops were planted meanwhile etc.)

Each new farmer who wishes to be registered as a new organic farmer for <organization AAA> is visited by a field officer. At this visit

- the requirements and obligations of being an organic farmer are explained
- the fields of the farmers are visited
- the field officer assists the farmer in completing the Farm Entrance Form (annex XX).
- the field officer draws a simple sketch of the farm (annex XX) with all plots of the farmer, rough indication of present crops, potential risks of drift
- the farmer also signs two copies of the contract with <Organization AAA> (see Annex IX).

Once the documentation is complete, the information will be processed by the ICS office as follows:

- The farm entrance form is screened by the organic manager and the conversion status is determined according to the Internal Organic Standard.
- Once accepted, the farmer receives a new code number and this code number is marked on all documents of this farmer.
- The new farmer is added to the village overview map with code number.
- The farmer's information is added to the list of registered farmers in conversion.
- The contract is countersigned by the Organic Approval Committee and a copy of the contract returned to the farmer.

5.2 Internal Inspections

Policy: Each registered organic farmer is inspected by the internal control at least once a year by qualified internal inspectors.

*1. There is at least one documented internal inspection per calendar year.

*2. The inspection must be carried out in presence of the farmer (or his/her representative) and must include a visit of the whole farm, storage of inputs and harvested products, as well as brief check of post-harvest handling and animal husbandry. The internal inspector verifies if the internal organic standards have been respected and if the conditions of last year's internal inspection have been fulfilled.

*3. The visit is documented in the Farm Inspection Checklist, which is signed by the internal inspector and acknowledged by the farmer (or his/her representative).

4. In case of severe non-compliances, the problems have to be reported immediately to the ICS Manager and all measures taken according to the internal sanction procedures.

Ad 1. One inspection per year is compulsory but, depending on the complexity of production and the length of the production cycle (e.g. 3 harvests per year), the rate of internal inspection may have to be intensified. Some projects have one formal internal inspection per year (with complete checklist) but several longer extension visits by the field advisor to update field data and also check on the performance of the farmer. Also some certification bodies will require a certain percentage of spot checks (announced or unannounced) to be done. Unannounced spot checks in addition to the regular annual inspection are highly recommended for all ICS operators.

Ad 2 Internal inspection should take place during the ‘critical moments’ in the production period: around planting and harvesting or in periods known for high risk of pests and diseases or potential use of herbicides. It may be good to do an annual plan for internal inspections and plan a certain % of inspections during all critical phase, but before buying. The inspection should focus on organic fields. But also non-organic fields (e.g. for home consumption) are visited and potential risks for organic crops noted. If the non-organic fields are far away from the organic fields, a spot check of these fields may be sufficient. The internal inspector should check that the same crops are not cultivated on both non-organic and on organic fields (no “parallel production” may take place). The internal inspection focuses on farm production (fertilization, pest control and use of inputs, weed control, origin of seeds, indication of drift, soil erosion, overall sustainability of production etc). Often yield estimates are registered (see chapter 4.3). For all new fields, a field history with the last use of forbidden products should be documented. The inspector should also check on post-harvest processing and storage facilities and controls if forbidden inputs are stored. Additionally, the animal husbandry should be inspected in order to ensure basic animal welfare and, if relevant, that no contamination of organic produce can take place, e.g., by tick control spraying. The internal inspector should also interview the farmer about the quantities sold and compare the information with the records and sales receipts of the farmer.

Ad 4 At the end of the inspection, a final discussion takes place in which the deviations and necessary corrective measures are explained. The findings of these internal inspections are noted on the Farm Inspection Checklist. The Farm Inspection Checklist must be acknowledged (by signature, finger print, etc.) by the farmer to confirm that the information given in the checklist is correct and that he/she accepts the results and acknowledges the proposed corrective measures of instructions for improvement. Sometimes non-compliances may be detected by field officers during advisory visits or similar. Obviously the same procedures (investigate-document-report-act) will be necessary in this case.

General: For a good internal control there must be a certain description of activities available. This part can either be included in the organic checklist (as done in the example in Annex XXX) or can be collected in a separate form (e.g., continuous documentation of farm activities and use of inputs, crop rotation, etc., by field officer) while the checklist really only checks whether everything is okay.

The internal inspection of the <organization AAA> takes place before harvest of the coffee. The internal inspector verifies the coffee fields and checks if all fields have been correctly registered and if new fields have been added. He/she verifies the cultivation measures and whether the seeds, pest

and weed control, and fertilization correspond to the internal standard. He/she verifies whether all measures against erosion have been taken and checks if there is any risk of drift from neighboring fields. He/she also checks whether the farmers cultivate non-organic home consumption crops (maize). In this case, he/she verifies if non-organic products are being used. He/she checks if the fields with home consumption crops are clearly separate from the coffee fields and that the home consumption crops are not being cultivated in young coffee plantations. In case of deviations from the internal standard, the conditions are noted in the farm inspection form. The internal inspector verifies the quantities that have been sold in the last year and registers the yield estimation for the present harvest. He/she checks the storage rooms of inputs and of the harvested coffee and the procedures for processing of the coffee cherries. All information is documented on the field inspection form, which is signed by the internal inspector and by the farmer (illiterate farmers confirm with fingerprint). At the end of the inspection, a final discussion takes place, in which the deviations and necessary corrective measures are explained.

5.3 Yield Estimates

Policy: There has to be a yield estimate for the organic cash crop of each farmer.

1. The internal control needs to provide yield estimates of the crop to be certified for each farmer. The estimates need to be available before harvest (or for a defined harvest period).

Correct yield estimates are important, but at the same time they are very difficult to obtain due to many influencing factors (especially weather conditions). Good harvest estimates are usually based on the quantities delivered by farmer in previous years, plus an assessment of the actual crop situation on the farm.

Yield estimates are important during buying, since the delivered quantities are continuously counterchecked with the estimates. If reliable harvest estimations are available, the purchase officer can detect if the farmer is trying to sell produce that does not come from the farmer's own farm.

Yield estimates may be registered during the internal control, but it may be more appropriate to, e.g., have the field officers record updated yield estimates in a different internal document (e.g., draft buying list) immediately before harvest so that reliable information is available and can be processed by the ICS Manager to produce the approved buying lists (see chapter 5.1).

In <organization AAA> the yield estimation is collected one month before harvest by the internal inspector. The data is first recorded in the internal inspection form and then handed over to the ICS coordinator. He/she elaborates the approved buying list, which is given to the purchase officer.

5.4 Internal Approval Procedures

Policy: The ICS operator has defined procedures to approve or sanction farmers.

1. All internal farm checklists are screened by the internal approval staff (Organic Approval Manager and/or the Organic Approval Committee, see chapter 6.2) with special focus on critical/difficult cases. The assessment of the internal inspector is checked, the (internal) certification status determined, and conditions set (if necessary).
- *2. The farmers' lists as the summary of the internal control are finalized and approved.

Ad 1 The results of the internal inspection must be formally confirmed in an approval procedure. This is usually done by a second competent person or group. This is analogous to the requirements for organic certification bodies (ISO 65/EN 45011) that also have to ensure that inspection and certification are not done by the same person. Depending on the project structure, it is recommended that the final approval decisions are not taken by an Organic Approval Manager (who may still prepare the farmer lists, etc.) but by an Organic Approval Committee (OAC). Such an OAC may be demanded by the organic certification body, however, this is not defined as minimum requirement here. See also comments in chapter 6.2.

Ad 2: The ICS presents the results of its inspection and approval process in the farmers list. Complying farmers are listed in their respective status (organic or conversion), deviating farmers are listed as sanctioned. For the external inspection an updated approved farmers list must be available. See also chapter 5.6 for requirements for the farmers lists.

When the internal inspection of the <organization AAA> is finalized, the inspection forms are handed over to the Organic Approval Committee, who revises the results. It checks the fulfillment of last year's conditions by the producers and the new conditions proposed by the internal inspector. It decides on approval or sanction of each producer and determines the conditions and the duration of the sanctions. Conditions and sanctions are registered in the farm inspection form. The results of the meeting are summarized in the list of approved and sanctioned farmers. Additionally, there is a short protocol of each meeting of the Approval Committee.

5.5 Non-compliances and sanctions

Policy: In case of non-compliances, appropriate corrective or mitigating measures are taken by the ICS.

1. It needs to be defined what happens in case of non-compliances (list of sanctions) and how the sanction measures are implemented.
- *2. Sanctions have to be documented (list of sanctioned farmers, documentation of identified non-conformities in files).
- *3. Farmers that have used prohibited inputs in their organic crop must undergo again the full conversion period (if they remain in the organic project). In such cases it has to be checked whether the farmers have already delivered produce and whether this (now no longer certified) produce has been commingled with other organic produce. If this has been the case, the organic certification body needs to be notified immediately and the commingled produce kept separate until further instructions.

Ad 1: It has to be determined how decisions on sanctions are being made (e.g., list of typical noncompliances and applicable sanction) and which measures must be taken (register the farmer and reasons for the sanction on the list of sanctioned farmers, ensure that the farmer's name is cancelled from the buying lists and that all personnel is informed accordingly, check whether the now de-certified product has already been commingled with other product).

Ad 3: If a grower fails to comply with the organic regulations/standards and this is not detected by the internal control, he/she exposes all of his/her fellow members to the risk of de-certification of the project or at least of big product lots. If a serious non-compliance is found during or after the processing, all the organic production lots that contain the

products of the offending grower may be de-certified. Also the ICS certification of the whole group may be threatened because the ICS has failed to detect the problem.

If a grower of <organization AAA> violates the internal standards the appropriate sanction and corrective measure is determined according to the list of nonconformities, annex XVI. In case of severe violations, the internal inspector or whoever detects the incident, has to fill in a violation report (Annex XV)

Sanctioned producers may not sell their produce to the <organization AAA> during the whole time of sanction. The reason and duration of the sanction is noted on the list of sanctioned producers (Annex XIV) and the purchase officer is informed accordingly.

5.6 Documentation of the ICS

Policy: The ICS ensures that all relevant documentation for each certified farmer is available for inspection. The internal control is documented.

1. The following documents must be available for each farmer

- *Formal commitment of growers to fulfill the internal standard (written contract)
- *Farm Entrance Form (farm data sheet), including last use of prohibited inputs
- Update farm data: update cropping information (areas, crops), use of inputs, harvested quantities,

Remark: info may be included in internal farm checklist.

- Maps (if required for single farmer)
- *Annual Farm Inspection Checklist
- Notes on trainings or advice given to the farmer by field officer

*2. As a summary of the internal control the following lists must be prepared:

- Farmers list with code and name of the farmer, total area, area under organic crop (or number of plants), date of registration as organic farmer, date of last use of forbidden products, date of internal inspection, name of internal inspector, result of internal inspection (separate lists for organic and for conversion farmers)
- List of sanctioned farmers with the reason and the duration of the sanction (if relevant).

Ad 1: Most internal documentation is usually held by the field officers; i.e., if the farmers are not able to keep some basic documentation by themselves, the field officers keep simple records on the most important farm activities. If farmers are literate, a small booklet might be useful, in which the farmers themselves record the most important data (planting, important cultivation measures, harvest dates, and approximate quantities) and in which the results of the field extension visits are also filled in. In very simple projects it may be considered sufficient that the registration of farming activities is only done in the course of the internal inspection.

It is recommended that the ICS documents be kept in the farmer's file; i.e. one file per farmer that includes all relevant documents (incl. those of the previous inspection).

Ad 2: Usually yield estimates are also included in this summary list (often called farmers table, farmers list or similar) but if they are documented in a separate document (e.g., buying list) the certifier may consider this sufficient and appropriate. Some organic standards (e.g., Bio Suisse) may require very detailed farmers lists including even

cultivation details on each plot, so it may be helpful to check with the certifier whether the proposed list format will be considered sufficient.

The documents of each farmer of the <organization AAA> are kept in the individual farm files. The farm files are stored in the offices of the regional centers of internal control (organic project sites). The farm files contain for each farmer the documents that have been established during the registration procedures (see 4.1.) plus the farm inspection checklists. The documents of one year are kept together in a plastic cover within the farm file. The data of all farmers and the results of the internal control are summarized in the farmer list and the list of sanctioned farmers (annex XIV).

In addition a small booklet is handed out to each farmer, in which he/she registers the activities undertaken on the farm like sowing, harvesting, fertilization, weed and pest control, and sales. When he/she is visited by the advisor/internal inspector, the date and result of the visit is noted in the booklet. If the advisor finds that a certain activity, quantity etc. has not been recorded by the farmer, he/she adds the information in the booklet and adds his/her initials to the data.

6 Organization and ICS Personnel

Policy: For each procedure or task of the ICS, one person is responsible. Staff is aware of their responsibilities and qualified for their job.

The ICS operator has to ensure that there is sufficient qualified personnel to implement the ICS procedures as described in the internal ICS document.

In the following chapters different staff positions are described, but obviously the names for each position or the exact split of responsibilities between different positions and persons may vary from operator to operator.

6.1 Organizational chart

1. An organizational chart (or similar) of the operator's organization needs to be available.

In such a chart an overview on organizational units, hierarchies and the positions of the organic project staff are usually given.

A template for an organization chart is given in Annex XVII.

6.2 The ICS Coordinator (ICS Manager)

*1. There has to be an assigned ICS coordinator who is in charge of coordinating the Internal Control System, organizing the internal inspections, coordinating between field staff and approval staff, coordinating the external inspection, and acting as a the contact person for the inspection body.

The ICS coordinator or ICS Manager is a crucial position within the ICS. The ICS coordinator is in charge of ensuring that the ICS is implemented. He/she organizes the extension service and the internal inspection (who inspects where and when), ensures that

the staff have all resources available to do the inspections/extension (e.g., means of transport etc.), makes sure that all farmers really are inspected and all new farmers registered properly. He/she organizes the staff trainings, coordinates all relevant aspects with the organic certification body, etc. The Approval Manager makes the decisions on the severity of deviations (i.e., like a certification officer), etc., whereas the coordinator is more the manager/organizer (like a general manager of the ICS). In many cases both jobs will be done by the same person, but this does not have to be the case.

6.3 Internal inspector

- *1. There must be a sufficient number of qualified internal inspectors.
- *2. The internal inspector must be sufficiently qualified to perform a thorough and objective internal inspection.
3. There must be a CV, a contract (including his/her duties), and a conflict of interest declaration available for each internal inspector.

Internal inspectors should be able to do internal inspections effectively and it is very important that the ICS operator ensures that each inspector understands well how to do effective farm checks, how to fill in the checklists, etc. This is also important since the overall assessment of the ICS will focus very much on the effectiveness of the internal inspection. It is recommended that internal inspectors regularly (e.g., at least once a year) accompany other experienced inspectors so that they learn from each other.

Normally the following requirements will be expected in order to consider an internal inspector “sufficiently qualified”:

- is fluent in the local language and idiosyncrasy of the farmers*
- can read and write*
- is familiar with the agricultural production and ecological systems of the area*
- is familiar with principles of organic agriculture, in internal control procedures, and with the internal regulation*
- must not have conflicts of interest that might affect his/her work (see chapter 6.5.)*

The Internal Inspector of the <organization AAA> signs the contract for organic project staff and a conflict of interest declaration.

He/She is responsible for the following tasks in the project:

- Drawing of village maps.
- Registration of the growers.
- Realizing the inspection of each farm at least once a year (see chapter 4.3.). The visits must be documented in the Farm Inspection Form.
- Realize regular visits to the buying stations during the harvest season in order to ensure that the procedures as mentioned in the ICS are followed.

The Internal Inspector keeps a diary in which his or his/her daily activities are noted, as well as the names and code number of the growers visited and the names of the buying stations visited. He/She hands over all inspection reports to the quality manager and reports on any doubt, fraudulent behavior, deviation, or any relevant observation.

It is regularly checked that the internal inspectors are qualified for their work. This is done by accompanying inspectors during their inspections and by regular training and work sessions with all internal inspectors (=field officers).

6.4 Organic Approval Personnel

1. There has to be a qualified person (“Organic Approval Manager”) or certification committee who is assigned to take the internal approval decisions.
2. Approval personnel must be qualified and able to take objective approval decisions.
3. There has to be a CV, a signed declaration of conflicts of interest, a written contract with list of responsibilities available for all approval personnel.

Approval procedures can be realized by an ICS coordinator or by an Organic Approval Committee. It is recommended to install an approval committee but it is not a requirement. The duties of the internal approval staff are to perform the approval as described in the chapter approval decisions. In case of an approval committee there is usually an organic approval manager as well who prepares the decisions (e.g., screens the reports and presents only the most critical ones to committee) plus the committee to actually approve the farmers (approve the farmers list). If there is only the organic approval manager he/she is usually responsible for all steps of the approval procedures. Often the organic approval manager is also the ICS coordinator (see 6.2) but it could also be different persons.

An approval manager or member of certification committee should fulfill at least the following requirements:

- He/she must be familiar with the principles of organic agriculture.
- He/she must be familiar with the internal regulation.
- He/she must be well respected among the farmers and the organization.
- He/she must not have conflicts of interests (see separate chapter)

The composition of the Approval Committee has to be carefully evaluated to have a balance of interests, but also minimize potential conflicts of interests.

The members of the Organic Approval Committee of the <organization AAA> are elected by the general assembly. The members must be trained in organic agriculture and know the internal regulation. The members are as follows:

The committee meets once a year, immediately after the internal inspection has been conducted and before purchase activities begin. The committee revises all internal inspection forms and makes the decisions on approval or sanction of the farmers. The committee documents all decisions and elaborates the list of approved and sanctioned farmers. It reports the results of the internal inspection to the respective farmers, the directors, and the responsible purchase staff, as well as to the external certification body.

6.5 Field officer (Extensionist, Field advisor)

Training of farmers in organic farming is very crucial and therefore the position of the field officer is usually very important. Many ICS operators fulfill their requirement to train the farmers in organic production by organizing a field extension service; i.e., in each project site there is one field officer who lives in the area, regularly visits the farmer, gives them

advice on how to improve their production of product quality, and assists them in case of production problems. Also field officers often keep some simple farm documentation on behalf of the farmers (farm maps, input registers, etc.). Obviously field officers must also report major deviations if they find them. If there are field advisors they should have a written contract and clearly assigned responsibilities.

At each project site there are two field advisors stationed. The field advisors visit the farmers at least three times a year and give them advice on their farm production methods. Farmers can also call the advisors for help in case of disease or pest problems. The field advisor updates the farmer's diary if he/she has not written any notes on his/her production. The field advisor can allow farmers to use those inputs that are listed in the internal regulation only. If during an advice visit a major problem on the organic farm is found, the ICS coordinator is informed. The field advisors have to keep a notebook to document their visits. At the farm they sign in the farmers farm diary and also write their advice to the farmer in this book.

6.6 Conflicts of interest

Policy: The ICS personnel must not have any conflicts of interest that might hinder the work.

- *1. The Internal Inspector is not allowed to inspect his/her own fields or the fields of his/her immediate neighbors, friends or family.
2. All possible conflicts of interests have to be declared in a written statement. It has to be ensured that alternative solutions are found for those cases where a conflict of interests would arise.

The prevention of conflicts of interests is a very important aspect of ensuring that internal inspections are done in a neutral, objective way. If an inspector would inspect his/her own close friends or family member, he/she might not really be able investigate the situation critically and report all critical aspects (in particular if there are any problems). Therefore internal inspector should normally not inspect their own home village; they are too closely involved to be "neutral". Another problem could arise in some countries if the inspector is very young and might not dare to question the answer of an elder person, let alone tell an elderly farmer that his activities are not correct. Another important conflict of interest is close involvement in marketing activities: if, e.g., one person is in a village in charge of doing the internal inspections and at the same time is in charge of organizing all organic purchase and he/she is, e.g., paid as an percentage of the quantities he/she is able to deliver to the buyer, how can he/she be interested in seriously checking whether the farmers really comply with the internal standard?

A controversial aspect is the separation of field extension (advise) and internal inspection. In general it is recommended that the extension function and the internal inspection are embodied in the same system and often field advisors are also internal inspectors. However a field officer (consultant) usually is a person that is very close to the farmer, lives in the same village, visits him/her regularly to discuss different matters, and therefore is usually not completely neutral as inspector. The internal inspection however shall be a thorough and complete check on the activities. Many ICS operators solve this problem by exchanging field officers between different regions for doing the internal inspection (i.e. a field officer inspects in the region of his fellow field officer and vice versa). However, since a good extension service is crucial for organic production, IFOAM presently supports the position

that, if the field advisor is neutral enough to do the internal inspection, he/she can do so if changing areas is not feasible.

The internal inspectors of the <organization AAA>, the ICS coordinator, the members of the internal approval committee, and the purchase officer must sign a conflict of interest declaration. The ICS coordinator is responsible for verifying that no conflict of interest occurs; i.e., that no tasks are assigned to staff who would have a conflict of interest for this activity (e.g. an internal inspector can not inspect his/her family members).

7 Training

The main objective of training is to inform and train organic growers and project staff in the relevant aspects of organic farming and, especially, to make them aware of the contents and practical implications of the internal regulation for organic agriculture.

7.1 Training of ICS personnel

1. Each internal inspector needs to receive at least one training per year by a competent person.
2. The date of participation and content of the training of all ICS staff needs to be documented in the staff files.

As mentioned before it is crucial that all organic staff is aware at all times of the organic procedures. Qualification of internal inspectors is particularly important and in addition to an official training it is much recommended that each inspector accompanies a couple of inspections of another inspector each year.

Also the approval staff or purchase staff might need training to ensure they are well aware of all requirements and are able to implement them. All such trainings should be documented and may be requested during the external inspection.

All internal inspectors and field officers are trained once a year (before the beginning of new control season, usually in April). The training shall include sample field inspections. Content of training is documented and a list of participants kept.

7.2 Training of farmers

Policy: The most important aim of an organic project is to improve the farmer's knowledge and understanding on how to farm organically and that organic farming is much more than simply not using chemicals. Therefore continuous training of farmers is a very important part of an organic project and is in the responsibility of the ICS operator.

1. Each farmer needs to receive at least one initial advisory visit by the extension service or in an organized training.
2. The participation and content of the training needs to be documented.

It is highly recommended to regularly train all organic farmers. Regular trainings may even be considered compulsory by the certifier in particular in case the crops are rather difficult to grow in organic quality or in areas with a high risk of use of prohibited inputs. A good extension/advice service usually ensures close contact to the certified farmers, their loyalty, and better product and production quality.

All farmers are visited regularly by field advisors for training purposes. These advisory visits are documented in the farmers' farm diary books and in the field advisors' notebooks. Farmers can address their field advisor at any time for help and advice. Advice is given free of charge. It is planned to create a model organic farm at each project site and to conduct practical training workshops for all farmers in the future.

Part C: Additional Procedures

The following chapters are important for the operator who will buy the produce from certified smallholders, process and store these products and market them as organic. This task can be within the responsibility of the ICS operator, but is not always. Also, the procedures from selling/buying onwards are, strictly spoken, not part of the Internal Control System. However, since all product flow aspects must also be duly organized and documented for organic certification, it is highly recommended that the procedures and forms of all steps for which the ICS operator is responsible are included in the group's ICS manual.

Also, the external inspection by an accredited organic certification body is not part of the ICS, but it is important for an ICS operator to understand what will be done in the external inspection and what coordination with the certification body will be necessary.

8 Buying, Handling, Processing, Export

The organization that will market the organic products will need to define procedures in order to guarantee the integrity of the certified product in all steps of product flow and avoid commingling between different qualities (organic, in conversion, and non-organic), as well as contamination with chemicals during purchase, storing, transport, or processing.

8.1 Buying Procedures

Policy: The buying procedures need to ensure the integrity of the organic product at the crucial interface of farmer - buyer. In principle, the buying from the farmers (until product is consolidated/packed) is under responsibility of the ICS.

The buying procedures need to include the following minimum requirements:

*1. The organic status of the delivering farmer is checked.

2. The supplied amount harvested is compared with the estimated yield. In case of doubt, the produce is kept apart until clarification by the organic ICS Coordinator.
- *3. Deliveries are registered in the buying record and farmer is issued a receipt (stating delivered quantities).
4. All documents have to indicate the organic quality (“organic” or “conversion”).
- *5. Labeling of the bags as organic/conversion (see chapter handling).

Ad 1. Organic status can be checked on approved buying lists or approved farmer list. In addition it may be useful to give farmers an “organic farmer identification card” with a photo, etc. The product organic status = organic status of the farmer.

Ad 2. See also chapter yield estimate. If the farmer delivers much more produce than the estimated quantity further clarifications are needed (usually under co-ordination of the ICS coordinator). This may include an assessment of why the yield estimate was not correct/up to date or an additional inspection of the farm to check whether the higher yield is reasonable. In some settings it may be the best solution to always send organic project staff for supervision of harvest procedures and to buy produce immediately after harvest.

Ad 3: A sample Buying Record is included in Annex XVII. In addition, it may be a good idea to give farmers individual purchase cards on which each sale is indicated and confirmed by both sides.

Ad 4 & 5: If the conversion product is to be marketed as non-organic (not as organic in conversion), no separate handling of the product is necessary.

In the <organization AAA> purchase is done as follows:

1. The farmer is identified as being an organic farmer or farmer in conversion. For easier handling, buying of organic farmers is organized on a different day than buying from conversion or not certified farmers.
2. Products of farmers in conversion are bought and marketed only as non-organic produce thus they are handled together with non-organic produce.
3. The purchase officer confirms that the delivered amount of organic product is plausible by comparing the actual delivery with the crop estimate (noted in the Buying Record by the Internal Inspector or ICS Manager at latest one week before delivery). If there is any doubt about the produce, the produce is kept apart until the ICS manager has checked with the respective farmer and has indicated whether or not to allow the produce into the organic supply chain.
4. The quantity of organic product delivered is recorded in the buying record with statement “organic”. When non-organic product is bought, the information will be entered in a separate notebook.
5. A cash voucher (receipt) is completed. The vouchers will be stamped ‘organic’ or ‘in-conversion’.
6. The farmer receives a copy of the cash voucher (receipt). Other copies will be kept in file by:
 - a) the purchase officer of the respective buying station
 - b) the Organic Manager
7. The bags of each ORGANIC farmer are labeled with a GREEN sticker of the organization (with the word organic on it).

8.2 Storage and Handling Procedures

Policy: During all handling of organic produce the organic quality of the product and compliance with respective documentary requirements of the applicable organic standard must be ensured.

Therefore buying procedures need to include the following minimum requirements:

- *1. General Handling Requirements at all stages of product flow:
 - identification of the product in all steps according to the quality (organic, in transition) during all stages of product flow
 - strict separation according to quality (organic, in conversion, non-organic)
 - no prohibited methods (fumigation of containers, irradiation/ionization, etc.)
- 2. Requirements during storage
 - Organic warehouse (part) must be labeled as “organic”
 - Facility pest management according to standard (see Annex XXX)

Ad 1: This usually implies that on the product or an accompanying document the organic quality is indicated with the word “organic” (or local translation). In some cases, a color code system or special bags for the organic produce may give the best results. In order to be able to identify the origin of the product in case of complaints by the importers, the organization should be able to trace back each lot of exported product and to identify the farm(s) of origin. For security, organizations are advised to install a system of traceability by lot-numbers, which enable the organization to trace back each product until the farm of origin. Such a system implies that whenever smaller lots are consolidated in bigger processing lots, this needs to be carefully documented.

Ad 2: If organic and non-organic produce are stored in the same warehouse, physical separation is required. Only the NOP standard regulates the facility pest management explicitly, but all operators are advised to comply with these criteria.

<Coffee> of the <organization AAA> is brought from the farmers to the purchase center in their own bags which are well closed and marked with the initials of the producer. After the buying procedure, the <coffee> is filled into bags of the <organization AAA>, which are marked with the name of the organization and the organic quality. The <coffee> of different qualities (organic, in conversion, and non-organic) is stored in separate storing areas, which are indicated with a sign. If necessary, the <coffee> is dried. <Coffee> of different qualities is dried in separate areas. After drying, it is again packed into the bags, which are marked with the name of the organization and the organic quality. The <coffee> is transported by trucks to the general warehouse. Cleaning of the stores is done with brooms, and if necessary with water and soap. Mechanical traps are used against pests. It is sent in rented trucks to the processing plant. In order to avoid a risk of co-mingling, the transport of different qualities is done over different periods of time. Before each transport, it is verified that the lorries are clean.

8.3 Organic Processing at <name processor>

Policy: During all handling of organic produce the organic quality of the product and compliance with respective documentary requirements must be ensured. Central Processing Units are always subject to full external inspection by the certification body.

*1. Ingredients and Processing aids must be defined

- all agricultural ingredients must be organic (some exceptions → clarify with certifier)
- only allowed non-agricultural ingredients and processing aids

*2. Separation and identification

- Separation and identification according to quality (organic, in transition, non-organic) during all stages of product flow
- All processing steps are duly documented

This chapter only deals with processing done at a central processing site (e.g., contracted processor) which is always subject to full inspection and certification by the certification body. Depending on the contract, either the party that owns the product or, e.g., the contracted processor is responsible for ensuring that the organic requirements are met (contract needed with processor). It is still highly recommended that the ICS also supervises the organic processing (to a reasonable extent). The simple post harvest processing on the smallholder farms themselves (e.g., de-pulping of coffee, drying of pepper on mats) is dealt with in the internal organic standard and checked during internal inspection. The same principal handling requirements as outlined above apply.

Ad 1: Many smallholder organizations produce simple products that are only dried or processed mechanically. In this case mainly point 2 is important. Sometimes, however, some processing aids or ingredients may also be needed during processing (e.g. natural dye during preparation of shea butter) and it must be ensured that all ingredients/processing aids meet the applicable standard. Each organic standard contains a list of processing aids and ingredients that may be used. Please ask your certifier for details.

When coffee of the <organization AAA> is entering the processing plant <processor BBB>, the responsible party checks if the bags are labeled and closed correctly and if the quantity and organic quality corresponds to the indication on the delivery document. The unprocessed <coffee> of different qualities (organic, in transition, and non-organic) is stored in separate areas, which are indicated with signs. <Coffee> of different qualities is processed in separate times. Before each processing of organic coffee, the person responsible for processing assures that the installations are carefully cleaned with air and brushes. After processing, the raw coffee is stored in the final export bags which are marked with the name of the <organization AAA>, the organic quality, and the name of the certifier. The <raw coffee> of different qualities is stored in separate areas, which are indicated with signs. Cleaning of all stores is done with brooms, and if necessary with water and soap. Mechanical traps are used against pests.

8.4 Organic Exports

Export of organic produce is according to some standards (EU Regulation) subject to inspection by the organic certification body. Export bags need to be labeled with the name of the organization, the organic quality (organic or in transition), and the name of the certifier. It must be assured that there is no risk of contamination, for example, by fumigations that are prescribed by the government. Depending on the standard, certain additional documents (EU inspection certificates) might be necessary for each shipment. Please note that if products are bought from different organizations/suppliers of organic produce, all products that are exported as organic must be certified organic and all suppliers known to the organic certification body.

Exports are handled by the Organization AAA. The Export Manager is in charge of preparing all export documentation. The organic quality is indicated in all invoices and internal export overview lists. During supervision of packing the bags on the trucks for transport to the harbor, it is checked that all bags are labeled correctly.

For each export consignment the export managers applies for an inspection certificate to the certifier.

8.5 Buying, Handling & Processing Personnel

8.5.1 Buying Personnel

- *1. There are buying officers in charge of ensuring correct buying of organic produce from the farmers.
2. Buying officers have to sign a contract with ICS operator with a list of responsibilities.

Ad: It depends on the project structure whether buying is organized by the ICS operator (e.g., the cooperative or the contracting processor) or by a company that coordinates the purchase with the ICS operators. As a principle, there needs to be a qualified and well trained buying officer in charge of the actual buying (i.e., at least one person per purchase center) since the buying process is crucial in the organic product flow control and mistakes on buying level will have a huge impact on the organic project (entire lots of organic products may be decertified because they contain the product of one single non-organic farmer). If there is more buying staff active in the buying procedures, it is the responsibility of the buying officer to ensure they understand the requirements and that they implement them correctly.

8.5.2 Warehouse Manager

If there are separate warehouses it may be necessary to specifically assign an organic warehouse manager who understands the organic handling procedures well and ensures that they are implemented.

8.5.3 Processing Manager

If there is a processing unit operated by the ICS operator it may be necessary to specifically assign an organic processing manager, or specifically train the processing manager in the organic handling procedures. If the processing of the organic produce is contracted to another company this company needs to be inspected by the organic certifier and is responsible for organic processing according to the internal handling rules. This is usually confirmed in a contract with the processor. It may still be a good idea to have the ICS operator send a supervisor to be present during organic processing.

9 External Inspection and Certification

During the external inspection by the organic certifier, the effectiveness of the Internal Control System will be evaluated. The external inspector re-inspects a certain number of farmers. The percentage of external control will be determined by the certifier on the base of a risk assessment (for details on minimum re-inspection rates see the IFOAM document “Smallholder Certification - Compilation of results”). Also the inspector may undertake witness audits; i.e. accompanies internal inspection visits to evaluate their effectiveness. The external inspector compares his observations with the documents of the internal inspection

and evaluates if the Internal Control System, the internal inspections (and the farm extension) fulfill the minimum requirements and are sufficient to guarantee that the organic activities of all farmers comply with the external regulations/standards.

Based on the result of the inspection, the certifier will decide if the organization will receive the certificate that enables it to realize organic exports or which conditions have to be fulfilled before the certificate can be issued.

In case corrective measures are required, it is important to have procedures in place to ensure that they are communicated to the right people and are implemented (usually coordinated by ICS coordinator) in due time.

Further Reading

- IFOAM Smallholder Group Certification – Compilation of Results, March 2003
- IMO/Naturland Manual for Quality Assurance - A Guideline for Internal Control Systems (ICS) in Smallholder Organizations, January 2002
- EU Guidance Document Guidance document for the evaluation of the equivalence of organic producer group certification schemes applied in developing countries, 6.11.2003
<http://www.oecd.org/pdf/M00038000/M00038051.pdf>

Annex → see separate document

Annex

The following Annexes may serve as sample documents or as illustration/basis for development of documents that are adapted to the specific situation of the ICS operator. The resulting internal forms and documents are to be included or enclosed to the ICS operator's internal ICS manual.

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I. Example Risk Assessment Coffee Organisation AAA

(organisation, first risk assessment, simplified checklist)

Risk criteria	Situation found	Assessment		
		H	M	L
Farming				
Are land properties clear and can farmers take the decisions needed for organic farming?	<i>The community owns the land, and the farmer decides about its use</i>			x
Are the farmers rotating their crops on changing plots of land? (shifting cultivation)	<i>Coffee plots are always the same, corn is planted on separate fields</i>			x
Are non-allowed products (pesticides, herbicides and fertilizers) easily available for the farmers? (in the region, in the villages)	<i>Non allowed products are not available in the villages, only in the town, it is very far away and very expensive for the farmers</i>			x
Does the farmer grow crops with high infection pressure of pests or diseases which are difficult to manage organically?	<i>Some growers in the area A, who do not participate in the organic programme use agrochemicals: They cultivate certain vegetables using pesticides (especially tomatoes and pepper grown for local sales). Corn is mainly grown without agrochemicals, but some farmers in area A use urea for fertilisation. Beans are always grown traditionally without agrochemicals.</i>		x	
Do the farmers in this region use any non- allowed products in coffee?	<i>No products used in coffee, only the coffee seed borer is sometimes a problem, but is traditionally controlled by recollecting the infested berries by hand. Coffee is fertilised with compost of the pulp or not at all.</i>			x
Are there producers in the organic programme which cultivate conventional crops for local sales or home-consumption using non - allowed products?	<i>The farmers who participate in the organic programme confirm that they do not use urea in corn. None of them cultivates vegetables for local sales. The vegetables grown for home consumption are cultivated without agrochemicals.</i>			x
Could farmers be tempted to use unallowed inputs if the price for coffee increases substantially	<i>No, coffee is growing well without inputs, farmers do not expect higher yields from application of inputs.</i>			
Is the spraying equipment used for conventional and organic treatments?	<i>The farmers do not use any spraying equipment</i>			x
Could organic fields be contaminated by drift of chemicals from adjacent conventional fields?	<i>No problem. Neighbouring coffee plots are cultivated traditionally without agrochemicals. The coffee is cultivated in the highland area, the corn near the village in the valley.</i>			x
Could organic fields be contaminated by ground or irrigation water from conventional fields?	<i>No conventional farms in the region</i>			x
Do the farmers store agrochemicals and is there any risk that the certified products might be contaminated?	<i>No</i>			x
Are there in the region any sources of contamination? (industries, mines, highways and others)	<i>No</i>			x
Are there any programmes to promote agrochemicals?	<i>No</i>		x	
Are there any programmes to prevent plagues or epidemics? (e.g. Malaria, Cancer of citrus)	<i>No</i>			x
Are GMO used in the region?	<i>No</i>			x
Buying, transport, storing, processing				
Is there a big price gap between organic and conventional product? (risk that organic farmers buy from conventional neighbours and sell the product as organic)?	<i>The price difference is 10% between organic certified and conventional coffee. Since coffee prices are low, farmers may be tempted to sell also family members coffee</i>		x	
Is it certain that there is no possibility to confuse or mix the products of different quality at the purchase centres and warehouses?	<i>Certain risk exists because conventional and organic purchase will be at the same centre, but purchase officers are already aware of the requirements</i>		x	

Contamination of the coffee from non- allowed products during transport or storage?	<i>For the transport of pergamin coffee the farmers use old bags from chicken feed. Mouse and rat control in the warehouse is done by cats</i>		x	
Can it be excluded that organic product stored can be contaminated with agrochemicals? (pest control in storing)	<i>Yes</i>			x
Is it certain that the transport equipment and the warehouses are not treated with products that are not allowed?	<i>ok</i>			x
All personal responsible for handling organic products has been trained on the specific requirements?	<i>The personnel in the buying station and in warehouse is well trained, but there will be some changes in personnel</i>		x	
H= High risk M=Medium Risk L= Low Risk				

Evaluation

It is highly improbable that farmers use or have used any prohibited inputs in their coffee or any crop intercropped with coffee. The farmers are experienced in traditional coffee management and know many organic techniques to improve soil fertility and prevent pests.

However the following risks were identified and countermeasures are proposed as follows:

- Farmers may be tempted to sell their family members coffee for the higher organic price → Strict purchase procedures, train farmers, register all farmers in village (if possible).
- Farmers could start using urea in corn or cultivate vegetables with a high risk of pests and use of pesticides. → The internal control needs to ask the farmers regarding the cultivation of corn and other crops. In order to prevent them from using agrochemicals, the co-operative start training to help farmers to improve cultivation of the other crops and introduce organic cultivation methods like compost, crop rotation and intercropping.

II. Example Risk Assessment Banana Organisation BBB

(Update risk assessment checklist)

Risk criteria	Situation found	Assessment		
		H	M	L
Farming				
Are all fields actually managed by farmer declared and known to ICS (e.g. also plots of family members which the farmer manages on their behalf)	<i>All fields are known, even family members plots (rare)</i>			x
Is there a risk of uncontrolled leasing in and leasing out of organic fields? (e.g. organic farmer leases out his cocoa plot for on year, tenant uses unallowed inputs without the farmers knowledge)	<i>Not common for the farmers in this area</i>			x
Are land titles/property rights/leasing rights clear and can farmers take the decisions needed for organic farming?	<i>The Farmers families owns the land. The adviser of the cooperative decides together with the farmer about the farm management</i>			x
Are the farmers rotating their crops on changing plots of land? (shifting cultivation)	<i>Banana plots do not move, farmers do not often take new plots</i>			x
Are non-allowed products (pesticides, herbicides and fertilizers) easily available for the farmers? (in the region, in the villages)	<i>Yes in the villages exist several agricultural stores which sell agrochemicals</i>	x		
Are there any programmes to promote agrochemicals?	<i>Five years ago, agrochemicals were given to the producers during electoral campaign. Some still have the products at home</i>		x	
Are “organic” inputs distributed by the government?	<i>Yes, different copper products. Farmers tend to think that they can use all distributed “organic” inputs. Often do not understand the use (e.g. homeopathic veterinary medicine)</i>	x		
Governmental extension service advises to use chemicals?	<i>Presently, extension service promotes only the use of allowed inputs. 2 years ago still promoted chemical farming, situation may change any time</i>		x	
Is the organic crop generally farmed without any chemical input / with only permitted inputs in the project region?	<i>In the rainy season the fungi “Mycospyrella” can attack the banana plantations. Most of conventional farmers in this valley use pesticides and fertilizers. However at least for plant protection mainly copper products (allowed) are used.</i>		x	
If yes, would the organic crops also be farmed organically if the price of the conventional product would rise substantially?	<i>Even in times of high banana price, the cultivation methods (even of organic farmers) remain unchanged. The presently used production methods work well.</i>			x

Risk criteria	Situation found	Assessment		
		H	M	L
Do the farmers grow crops that are vulnerable to pests or diseases which are difficult to manage organically? (e.g. tomatoes, cardamom)	<i>Some vegetables in the home gardens are difficult to manage organically.</i>	x		
Are there producers in the organic programme which cultivate conventional crops for local sales or home-consumption using non - allowed products?	<i>Some of the organic farmer grow conventional vegetables for local sales.</i>		x	
Are these conventional crops potentially grown in the organic fields (e.g intercropped with banana, or in young banana plantations)?	<i>Vegetables usually grown on clearly separate vegetables plots. However certain risk remains that the vegetables may be grown in young plantations</i>	x		
Are the producers aware of organic production methods and confident that organic farming is suitable for them.	<i>In begin of organic project, farmers very hesitant to organic farming. Now, most farmers are well convinced that the organic farming is the best way to cultivate bananas. Some even convert their vegetables.</i>		x	
Is the spraying equipment used for conventional and organic treatments?	<i>Organic treatments are organized by the cooperative and sprayed by airplane. The planes are also used by conventional farms.</i>	x		
Could organic fields be contaminated by drift of chemicals form adjacent conventional fields?	<i>There is a certain risk as there are conventional neighbours who spray with backpack sprayers. In one area the neighbouring conventional farm is treated by airplane.</i>	x		
Could organic fields be contaminated by ground or irrigation water from conventional fields?	<i>The irrigation water comes in canals directly to the banana plots</i>		x	
Do the farmers store agrochemicals and is there any risk that the certified products might be contaminated?	<i>Some of the organic farmers store agrochemicals for use in their vegetable garden. Some producers store old agrochemicals which had been a gift during electoral campaign 5 years ago.</i>	x		
Are there in the region any sources of contamination? (industries, mines, highways and others)	<i>No</i>			x
Are there any programmes to prevent plagues or epidemics? (e.g. Malaria, Cancer of citrus)	<i>Sometime the board of plant protection orders the application of fungicides against Mycospyrella. Allowed products (coppersulfate and mineral oil) are applied in all conventional and organic plots</i>		x	
Are GMO seeds used in the region?	<i>No.</i>			x
Internal control				
Is the distance between regional groups manageable for internal control and product purchase?	<i>50 Km , ok no problems</i>			x
Do the organic manager and his staff have the required infrastructure to realise the internal control?	<i>Office room with 1 computer available. All inspectors of the cooperative have motorcycles, calculators and stationary. The organic coordinator has a pickup</i>			x
Has it been assured that there are sufficient internal inspectors to realise the inspection work?	<i>Some problems in finishing all inspections in time before harvest. Now one additional inspector employed</i>			x
Are responsibilities defined in such a manner that conflicts of interest can be excluded?	<i>Internal inspectors do not realise the inspection of their own community, but of another group.</i>			x
Buying, transport, storing, processing				
Is there a big price gap between organic and conventional product? (Risk that organic farmers buy from conventional neighbours and sell the product as organic)?	<i>The price difference is 25% between organic certified and conventional banana.</i>		x	
Is it certain that the purchase centre only buys products from certified organic farmers, and if necessary separates the different quality? (organic in transition, conventional)	<i>Yes only organic banana is packed. Fruits in transition are sold as conventional in the local market. Purchase officers receive a ready purchase list with only the authorised organic farmers on the list.</i>			x
Would the purchase personnel gain financially from buying from uncertified farmers and could hence be tempted to do so?	<i>Purchase officers are employed and the money is paid to the farmers after purchase – hence no incentive for fraud. Also always field advisor present during purchase.</i>			x
Is it certain that there is no possibility to confuse or mix the products of different quality at the purchase centres and warehouses?	<i>The fruits of every farmer are packed separately and the banana cases identified with the producer code</i>			x
Can it be excluded that organic product is contaminated with agrochemicals during storage? (pest control during storing)	<i>Not applicable because no warehousing of banana</i>			x

Risk criteria	Situation found	Assessment		
		H	M	L
Transport equipment and the warehouses are not treated with unallowed products (even not export container)?	<i>No treatment of pickups and warehouse. Fumigation of containers is not practiced.</i>			x
All personal responsible for handling organic products has been trained on the specific requirements?	<i>The personnel in the packing station is well trained, but there will be some changes in personnel</i>			x

Evaluation

The banana grow usually well with organic measures. Also the social control in the area is rather good, farmers check on each other. However, the following risks were identified and countermeasures proposed

Important Risk	What can we do about it?
Organic production of the home consumption crops is difficult (requires more efforts) and some of the organic farmer grow vegetables for local sales still conventionally and store in their house agrochemicals for use in their vegetable garden.	<ul style="list-style-type: none"> intensify training of the farmers intensified regarding organic cultivation methods for home consumption crops more frequent advisor visits with focus also on vegetables inform farmer about danger of agrochemicals for their health and for the environment additional (unannounced) inspections in order to guarantee that no prohibited products are used in the organic banana fields.
Organic treatments are organized by the cooperative and sprayed by airplane. The planes are also used by conventional farms. There is a risk that residues of conventional products remain in the airplane and contaminate the organic field	<ul style="list-style-type: none"> Tanks of the plane are always cleaned at least three times before use. Ask certifier which products to use for cleaning Elaborate a ICS form to document the cleaning
Many organic farmers have conventional neighbours who spray with backpack sprayers. In the community Villa del Carmen, the neighbouring conventional farm is treated by airplane. There is certain risk of contamination of the organic fields esp. from aerial spraying	<ul style="list-style-type: none"> ICS needs to assure that buffer zones to conventional neighbours are planted. If neighbouring fields are treated by airplane, there needs to be a buffer zone of at least 50 meters. The internal inspectors need to be instructed accordingly and include the information in the internal inspection checklist.
Some producers store old agrochemicals which had been a gift during electoral campaign 5 years ago	<ul style="list-style-type: none"> The internal inspector needs to be instructed to check the products stored by each farmer in the internal inspection form All old products must be removed immediately. A solution has to be found what to do with them.
The irrigation water comes in canals directly to the banana plots. However certain risk that overflow water from conventional parcels flows back into the irrigation channel	<ul style="list-style-type: none"> Check during internal inspection
Sometimes, an official department of plant protection orders the application of fungicides against <i>Mycospyrella</i> , however only allowed products are used (coppersulfate and mineral oil are applied in all conventional and organic plots).	<ul style="list-style-type: none"> There should be coordination with the other organic organisations in the area in order to assure that the spraying company really uses the product instructed by the plant protection department.
Sometimes farmers may use “organic” products distributed by government.	<ul style="list-style-type: none"> Farmers receive a clear list with a few allowed inputs, all others are prohibited. Advisors shall stress that during visits.
Government presently promoting organic, but this may change.	<ul style="list-style-type: none"> Ensure good contact with governmental extension programmes. Keep informed on possible changes in strategy of the advisors.
There is a certain risk that farmers could sell conventional banana from other farms as organic (and one such case was experienced).	<ul style="list-style-type: none"> internal inspectors always visit every farm before harvesting, marks all banana trees to be harvested and reports the authorised quantity to the buying department. Inform farmers on consequences of such a behaviour, promote social control mechanisms. Interview also some neighbours Spot checks during harvesting.

III. Example General Risk Assessment Checklist

Risk criteria	Situation found	Assessment		
		H	M	L
Farming				
Are all fields actually managed by farmer declared and known to ICS (e.g. also plots of family members which the farmer manages on their behalf)				
Is there a risk of uncontrolled leasing in and leasing out of organic fields? (e.g. organic farmer leases out his cashew plot for one year, tenant uses unallowed inputs without the farmers knowledge)				
Are land titles/property rights/leasing rights clear and can farmers take the decisions needed for organic farming?				
Are the farmers rotating their crops on changing plots of land? (shifting cultivation)				
Are non-allowed products (pesticides, herbicides and fertilizers) easily available for the farmers? (in the region, in the villages)				
Are there any programmes to promote agrochemicals?				
Are “organic” inputs distributed by the government?				
Governmental extension services advise to use chemicals?				
Is the organic crop generally farmed without / with only permitted inputs (pesticides, herbicides and fertilizers) in the project region?				
If yes, would the organic crops also be farmed organically if the price would rise substantially?				
May even farmers in the organic project be tempted to use chemicals because not enough confidence in organic methods / organic methods not working well?				
Do farmers grow other crops that are vulnerable to pests or diseases which are difficult to manage organically? (e.g. tomatoes, cardamom)				
Are there producers in the organic programme which cultivate conventional crops for local sales or home-consumption using non - allowed products?				
Are these conventional crops potentially grown in the organic fields (e.g. intercropped with banana, or in young banana plantations)?				
Are the producers aware of appropriate organic production methods and confident that organic farming is suitable for their crops?				
Is the spraying equipment used for conventional and organic treatments?				
Could organic fields be contaminated by drift of chemicals from adjacent conventional fields?				
Could organic fields be contaminated by ground or irrigation water from conventional fields?				
Do the farmers store agrochemicals and is there any risk that the certified products might be contaminated?				
Are there in the region any source of contamination? (industries, mines, highways and others)				

Risk criteria	Situation found	Assessment		
		H	M	L
Are there any programmes to prevent plagues or epidemics? (e.g. Malaria, citrus cancer)				
Are GMO seeds used in the region (incl. seeds for intercrops)?				
Do farmers use pest control measures during harvesting (e.g.				
Internal control				
Is the distance between regional groups manageable for internal control and product purchase?				
Do the organic manager and his staff have the required means (finance, infrastructure, means of transport, etc.) to realise the internal control?				
Has it been assured that there are sufficient internal inspectors to realise the inspection work?				
Are responsibilities defined in such a manner that conflicts of interest can be excluded?				
Buying, transport, storing, processing				
Is there a big price gap between organic and conventional product? (Risk that organic farmers buy from conventional neighbours and sell the product as organic)?				
Is it certain that the purchase centre only buys products from certified organic farmers, and if necessary separates the different quality? (organic in transition, conventional)				
Would the purchase personnel gain financially from buying from uncertified farmers and could hence be tempted to do so?				
Is it certain that there is no possibility to confuse or mix the products of different quality at the purchase centres and warehouses?				
All personal responsible for handling organic products has been trained on the specific requirements?				
Are the planned measures sufficient to ensure separation of organic and non-organic products during processing.				
Are all ingredients and auxiliaries known that will be used during processing and has it be confirmed by certifier that they are ok?				
Can it be excluded that organic product can be contaminated with agrochemicals during storage? (pest control during storing)				
Transport equipment and the warehouses are not treated with unallowed products (even not export container)?				

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

Comments:

IV. Regulation EU: Regulation 2092/91

Note: the following requirements are only a brief summary of the regulation and were interpreted with regard to the most relevant aspects in smallholder situations.

The whole regulation text including all annexes (88 pages) can be downloaded at:

http://europa.eu.int/eur-lex/en/consleg/main/1991/en_1991R2092_index.html (click on “preamble-consolidated provisions)

Aspect	Requirements
definition of production unit	<ul style="list-style-type: none"> ▪ Production unit: all farming activity under management of the organic farmer: this includes the fields to produce the main organic crops, to produce conventional cash crops, the plots for home-consumption-crops and animal husbandry. ▪ The whole production unit is considered in the internal or external inspection
conversion (transition) period	<ul style="list-style-type: none"> ▪ The conversion period is defined based on the last date when inputs or prohibited techniques were used. ▪ The conversion period is defined in Regulation (EEC) No. 2092/91 as follows: <ul style="list-style-type: none"> - Annual crops: A crop may be recognised as organic, if a transition period of at least 2 years has been fulfilled before sowing the crop. - Perennial crops: a three-year transition before the first harvest of the organic product needs to be fulfilled. ▪ In the case that there is sufficient proof available that the farm was not treated with any prohibited product for more than 3 years it may be possible to recognise the conversion period retroactively (or at least to some extent). Only the certifier has the competence to define precisely the beginning of the transition period and will define the rules. ▪ The product of the first year of transition may not be marketed as product “in transition” but needs to be sold as conventional product. ▪ During the conversion period, the farmer is categorised as a farmer in conversion. He needs to be included in the internal control and registered in the producer’s list presented for the external inspection.
Soil Management	<ul style="list-style-type: none"> ▪ Soil management on organic production shall maintain and/or build up organic soil matter, structural stability and biological activity. ▪ This is achieved by cultivation of soil building plants (e.g. legumes, deep rooting plants) as intercrops or rotation crops, incorporation of manure and organic matter (e.g. compost), maintenance of cover vegetation or mulching, other measures to prevent erosion
Seed and Planting Stock	<ul style="list-style-type: none"> ▪ Use of species and varieties adapted to the local conditions of the area. ▪ Seeds and reproduction material of organic origin for the organic cash-crops, rotation-crops and inter-cropping species. ▪ Only if such seeds or planting stock is not available, conventional seeds and planting stock may be used, usually this needs to be approved by the certifier. The seeds and planting stock must not be treated with prohibited products. ▪ It has to be ensured that the seeds are not genetically modified (risk crops e.g.: soya, maize, cotton)
Plant Protection	<ul style="list-style-type: none"> ▪ Pests, diseases and weeds are controlled by choice of appropriate species/varieties, appropriate rotation/intercropping, mechanical measures, protection of natural enemies.
Off-farm-inputs	<ul style="list-style-type: none"> ▪ Only plant protection products listed in Annex II of Regulation (EEC) No. 2092/91 are permitted. ▪ Only the fertilisers listed in Annex III of Regulation (EEC) No. 2092/91 are permitted. If animal manure is used it must come from traditional production (no factory farming) ▪ Prohibited products shall not be stored within storage premises of the organic production unit. ▪ Appropriate measures have to be taken to prevent drift from conventional neighbouring fields (buffer zones, non-harvest zones, hedges/trees, non-spraying agreement with neighbours, etc.)
Part conversion	<ul style="list-style-type: none"> ▪ For smallholder farmers it is usually demanded that the whole production unit is managed organically (i.e. that the farmer has not both organic and conventional fields). ▪ If there are farmers who could not yet convert all of their plots or crops to organic agriculture (ex. fields with conventional crops for local sale or home-consumption) the following additional aspects need to be ensured: <ul style="list-style-type: none"> - Conventional plots must be clearly separate from the organic plots. Conventional crops may only be produced on clearly defined fields that have to be indicated on the maps with the word “conventional” and preferably in another colour. - Conventional fields need to have sufficient distance from the organic fields or must be separated by buffer zones, so that a risk of drift is excluded. - The same crop as is grown organically may not also be grown on the conventional fields - Farm inputs stored by the farmers for use in the conventional unit need to be fully declared by the farmers and registered by the internal control.

	<ul style="list-style-type: none"> - Inputs for the conventional unit have to be stored separately from the ones used in the organic unit and need to be applied with different devices. - The internal control needs to also check the cultivation (application of inputs) of the conventional plots in the annual control.
Harvest and post harvest procedures	<ul style="list-style-type: none"> - During harvest and post harvest processing on the farm it has to be ensured that the organic product is not contaminated nor commingled with not certified or conversion products. - If during the post harvested processing additives are used, they must be listed in Annex VI of the regulation, if additional ingredients are used by the farmer, they should be certified organic (or: check additional requirements for use of conventional ingredients)

V. Regulation USA: The NOP Standard

Note: the following requirements are only a brief summary of the NOP standard and were interpreted with regard to the most relevant aspects in smallholder situations. *All aspects written in italic are identical to the requirements of the EU-Regulation*

The full regulatory text can be downloaded at: <http://www.ams.usda.gov/nop/NOP/standards.html>

Aspect	Requirements
definition of production unit	<ul style="list-style-type: none"> ▪ Only NOP-organic fields considered (check conventional fields only for potential risk of contamination of organic fields)
conversion (transition) period	<ul style="list-style-type: none"> ▪ No prohibited inputs may have been used on the NOP-organic fields for at least 3 years ▪ During the conversion period (i.e. 3 years after last application) the fields/crops cannot be certified as NOP-organic (no conversion status)
Soil Management & Fertilisation	<ul style="list-style-type: none"> ▪ <i>Soil management on organic production shall maintain and/or build up organic soil matter, structural stability and biological activity.</i> ▪ <i>This is achieved by cultivation of soil building plants (e.g. legumes, deep rooting plants) as intercrops or rotation crops, incorporation of composted livestock manure and organic matter (e.g. compost), maintenance of cover vegetation or mulching, other measures to prevent erosion</i> • Raw organic manure must be composted unless (a) on crops not for human consumption or (b) incorporated in the soil 120 days before harvest (if edible plant part in contact with soil) or for 90 days before harvest (otherwise) • Compost requirements: initial C:N ratio between 25:1 and 40:1; maintained at 55-77°C for 3 days (in-vessel/aerated system) or for 15 days (windrow composting system, materials turned at least 5 times) or equivalently efficient composting methods.
Seed and Planting Stock	<ul style="list-style-type: none"> ▪ <i>Use of species and varieties adapted to the local conditions of the area.</i> ▪ <i>Seeds and reproduction material of organic origin for the organic cash-crops, rotation-crops and inter-cropping species.</i> ▪ <i>Only if such seeds or planting stock is not available conventional seeds and planting stock may be used. The seeds and planting stock must not be treated with prohibited products.</i> ▪ <i>It has to be ensured that the seeds are not genetically modified (risk crops e.g.: soya, maize, cotton)</i>
Plant Protection	<ul style="list-style-type: none"> ▪ <i>Pests, diseases and weeds are controlled by choice or appropriate species/varieties, appropriate rotation/intercropping, mechanical measures, protection of natural enemies.</i> ▪ <i>Appropriate measures have to be taken to prevent drift from conventional neighbouring fields (buffer zones, non-harvest zones, hedges/trees, non-spraying agreement with neighbours, etc.)</i>
Off-farm-inputs	<ul style="list-style-type: none"> • All natural (non-synthetic) protection products may be listed (except nonsynthetics in 205.602). Also all synthetic substances listed in National List (part G of standard, § 205.601) are permitted. (in a few aspects stricter than EU, in many aspects less strict) • All natural (non-synthetic) fertilisers may be used without restrictions (except composting requirements). Also all synthetic substances listed in National List (part G of standard, § 205.601) are permitted. (less strict than EU Regulation) • Also all products used as disinfectants and sanitizers in the production/ (e.g. in irrigation system) need to be included in national list
Part conversion	<ul style="list-style-type: none"> ▪ <i>For smallholder farmers it is usually demanded that the whole production unit is managed organically (i.e. that the farmer has not both organic and conventional fields), but this is not directly demanded by NOP</i> ▪ If the farmer also has conventional fields, it only has to be ensured that the organic crops are not contaminated:.
Harvest and post harvest procedures	<ul style="list-style-type: none"> - <i>During harvest and post harvest processing on the farm it has to be ensured that the organic product is not contaminated nor commingled with not certified or conversion products.</i> - If during the post harvested processing additives are used, they must be listed in national

list §205.605 of the regulation, if additional ingredients are used by the farmers, they should be certified organic (or: check additional requirements for use of conventional ingredients). If any such additives or conventional ingredients are used the product can only be labelled as “organic” not as “100% organic”.

VI. Important Private Organic Standards

(general comparison, some aspects may not be relevant for smallholder farmers)

Label (main market)	Most important additional requirements (for international operators, without livestock certification)
Demeter (international) http://www.demeter.net	<ul style="list-style-type: none"> • According to the principles of bio-dynamic agriculture the entire enterprise, including all the fields and animal husbandry must be converted. • cattle or other ruminants must be kept on agricultural farms, • soil fertility is to be maintained primarily through the use of well rotted compost, which has been prepared with the biodynamic compost preparations, • all areas are to be sprayed with the biodynamic horn dung and horn silica preparations, • no use of copper in vegetables, use of copper on perennial crops is restricted to max. 3kg/ha/year.
Naturland (Germany, US, Europe) www.naturland.de	<ul style="list-style-type: none"> • Entire operation must be converted to organic farming • Focus on soil fertility and soil building measures, restricted total external organic fertiliser inputs • Limits on the use of copper (3 kg/ha/yr) • Seeds must not be treated (even not if untreated seeds are not available) • Obligation to promote bio-diversity and have ecological balance areas • No burning of trees or organic materials, not clearing of virgin forests • Annual crops: at the very least 1/6 of agricultural area should be leguminous in the crop rotation pattern • Detailed and well defined requirements for smallholder organisations internal control systems.
Soil Association (UK) www.soilassociation.org	<p>For crop production the main differences to the EU-Regulation are:</p> <ul style="list-style-type: none"> • no GMO crops (e.g. GM testing sites) in a radius of 9 km around organic farms; 5 years conversion period following the growing of a GM crop • specific conversion requirements (soil building phase necessary, and may not be switched in and out of organic production) • Maximum heavy metal levels in soil and manure • 10 m buffer zone to conventional fields (if no hedge) • Certain organic fertiliser restricted: peat (prohibited), sulphate of potash (restricted); certain crops may only be planted on the same field (potatoes, brassicas) for one year in four. • Plant protection: metaldehyd prohibited
Bio Suisse (Switzerland) http://www.bio-suisse.ch/uploads/e_bibliothek_9-1.pdf	<p>As per Swiss Organic Ordinance (Regulation), the conversion period for organic farms is 2 years only; products may be labelled as “conversion” from the 5th month of conversion onwards. The begin of conversion is usually the date of the first inspection (if no unallowed inputs have been used from then onwards) and cannot be set retrospectively further than to January of the first year of inspection.</p> <p>In addition to the requirements of the Swiss Organic Ordinance (in most aspects equivalent to Regulation (EEC) N° 2092/91), Bio Suisse projects are required to fulfil the following criteria:</p> <ul style="list-style-type: none"> • Overall Management Policy (whole farm operation must be managed according to Bio Suisse requirements, animal husbandry at least according to IFOAM minimum criteria); sometimes a binding 5 years conversion plan towards fully organic production is accepted. • Areas set aside to foster biodiversity (hedges extensively managed pastures or meadows, extensively managed orchards, nature reserves, etc.) must comprise at least 7% of the land used for agricultural purposes • Limits on the use of copper (max. 4kg Copper/ha/year or 1,5 kg/ha for pome fruits and 2 kg/ha for berries) • Limits on the use of fertilisers (crops max. 225 kg N/ha/yr, 90 kg P₂O₅/ha/yr, for vineyards: 180kg N, 70 kg P₂O₅ and fruit producers: 55 kg N, 20 kg P₂O₅)

	<ul style="list-style-type: none"> Processors and traders also need to be inspected according to Bio Suisse criteria in particular with regard to handling Bio Suisse products separately from other “organic” goods; Bio Suisse processing standards apply. No air shipment of goods; only imported products that are at the time of marketing not available in Bio Suisse quality within Switzerland can be labelled as Bio Suisse. Smallholder projects: Minimum requirements for participation as outlined in the Naturland Smallholder Certification Manual. With well-working internal control system that fulfils the high Bio Suisse standards, Bio Suisse may still require up to 20% of all farmers to be inspected annually by the inspection body (unless very well organised ICS; reasons for lower inspection rate stated and explained by certification agency). Possibly this will change → check with Swiss importer and Biosuisse before inspection conversion status will be defined by Bio Suisse according to their overall evaluation.
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Source: UNCTAD handbook “Organic Fruit and Vegetables from the tropics” (author IMO), updated by IMO Dec.03

VII. Example Internal Organic Standard Coffee Organisation AAA

(EU-Regulation 2092/91 and Naturland standards)

- If a farmer wants to join the organic programme, he needs to apply for admission six months before the harvest starts. He needs to declare to the internal inspector all of his plots (coffee and others) and if agrochemicals have been used on any of his fields. (See internal rules for the registration of new farmers). For new farmers and also for all new fields, the last use of unallowed inputs is investigated. After the last application at least 3 years conversion are necessary.
- The whole farm is certified and the following rules apply to all crops and fields:
- The farmer has to convert his whole farm land (all crops) to organic, i.e. it is not permitted to use artificial fertiliser or pesticide/herbicide on any part of the farm. This includes also the home garden and the tree nursery.
- All seeds/seedlings/planting stock used must originate from organic farms. Only if no organic seeds and planting material are available, conventional but untreated seeds may be used. Coffee seedlings have to be obtained from the organisation’s own organic nursery or from own propagation.
- Fertilisation may only be realised with green manure, dung or compost. For compost preparation no chicken dung from intensive production may be used. If necessary and confirmed by the field officer, rock phosphate may be used.
- For plant protection only the fungus *beauveriana bassiana* is authorised. In case of necessity, the product is distributed by the co-operative.
- The farmer is not allowed to use any off-farm inputs (fertilisers, insecticides, fungicides, herbicides, etc) except those for which he has been explicitly been granted permission by the internal inspector. Naturally grown (botanical) fertilisers/pesticides can be used but also need to be announced to the internal control before use. The internal inspector uses for his permissions a list of inputs which have been authorised for use by the certification body.
- The farmer is obliged to ensure soil fertility by appropriate cultivation measures (mulching, legumes, cover crops, green manure, compost, and associate adequate shade species of trees to the coffee etc.).
- Introduce measures against erosion such as cultivation along the slopes, planting green barriers, building terraces and earth bundles, etc.
- Weed control needs to be realised with adequate techniques, cutting the grass high enough in order to avoid erosion. The use of hoes is forbidden.
- The coffee trees must be pruned according to their state of development. It is forbidden to burn the cut branches or leaves, they need to be used for mulching or elaboration of compost.
- The farmer is not allowed to store any unallowed inputs on the farm.
- The farmer has to guarantee that during the wet processing and drying of coffee, the coffee from his plots is not being mixed with coffee from other farms and that no forbidden auxiliaries are being used.
- If a farmer keeps animals for home consumption, he needs to assure, that the basic organic principles are being met (animal friendly keeping, organic fodder where possible, restricted medication).

VIII. Example Internal Organic Standard Banana Organisation BBB

Banana organisation BBB (EU Regulation and NOP)

- If a farmer wants to join the organic programme, he needs to apply for admission three months before the end of the previous year. (See internal rules for the registration of new farmers). He needs to declare to the internal inspector all of his plots (banana and others) and the date of last application of agrochemicals. Farmers who already participate in the organic programme but have new fields also need to declare the last use of unallowed inputs. After the last application at least 3 years conversion are necessary.
- Each new farmer has to attend a training in organic production in the first year of registration.
- The farmer may cultivate clearly defined fields conventionally (marked on the map). He must not cultivate bananas on these fields. The conventional fields must remain the same and may not rotate to organic areas. The farmer has to declare openly all cultivation measures, purchase of inputs and treatments realised on these fields.
- The farmer must take great care to prevent drift of chemicals from own conventional areas or neighbouring fields.
- The farmer is not allowed to use on his organic plots any off-farm inputs (fertilisers, insecticides, fungicides, herbicides, etc) except those for which he has been explicitly granted permission by the internal inspector. Naturally grown (botanical) fertilisers/pesticides can be used but also need to be announced to the internal control before use.
- Fertilisation may only be realised with *dung*, *compost* and *stone meal*. For compost preparation no chicken dung from intensive production may be used. If necessary, *magnesia-sulphate*, *potassium-sulphate* and *rock phosphate* may be used after approval of the field officer. Only the following commercial products may be used, which have been authorised by the certifier: <Magnesia-sulphate “Azul Cielo”>, <Potassium-Sulphate “Sulporang”>, <GARA Rockphosphate> produced by <Greenfield Industries>.
- For plant protection of banana and other crops cultivated in the organic farming unit, products based on neem, mineral oil and copper are authorised. Only the following commercial products may be used, which have been authorised by the certifier: <Neemaz>, <Oilspray Organic> and <Copperplus> produced by <Organic Company>.
- If other products than the above mentioned shall be used, the use needs to be applied for and authorisation needs to be granted by the certifier before use.
- The farmer has to store the inputs used in the conventional farming unit in such a manner that no contamination of organic inputs or crops can take place. He has to give access to the internal and external inspector to verify the storing of inputs.
- In order to avoid any contamination of the organic fields, the organisation provides spraying equipment for exclusive use in the organic unit to the farmers who are using their own backpack sprayer in the conventional farm unit.
- If pest control treatments are realised by the organisation, the ICS supervisor assures that the airplane is cleaned sufficiently before spraying.
- The farmer is obliged to ensure soil fertility by appropriate cultivation measures (mulching, legumes cover crops, green manure etc.) and to minimise erosion.
- All seeds/seedlings used must originate from organic farms.
- If a farmer keeps animals for home consumption, he needs to assure, that the basic organic principles are being met (animal friendly keeping, organic fodder where possible, restricted medication). If production is exceeding home consumption, the internal control checks if the organic principles according to IFOAM rules are being fulfilled (regarding housing, pasture, feeding, medication etc.).

IX. Farmers contract

CONTRACT

<name of farmers association>

and

<farmers name> Code Nr, < >

The <association>

1. Co-ordinates the entire organic project.
2. Provides support services to the farmer with advice on organic farming.
3. Co-ordinates the internal and the external organic inspection.
4. Buys the organic <export crop name> for a sustainable and transparent price including a possible organic premium (depending on market) when the <export crop name> is of suitable quality.

The farmer <farmers name> declares:

5. I, the undersigned, accept to become/am a member of the <name association> organic project. Certified and controlled by <name certifier>.
6. I promise to follow the organic agricultural principles outlined in the Internal Organic Standard as well as the Internal Control System (ICS).
7. I will not use pesticides, herbicides or synthetic fertilisers on any crop within my certified organic fields.
8. I shall endeavour to maintain at least the following organic principles:
 - Follow the rules of the Internal Organic Standard regarding seeds, fertilisation and pest control.
 - Maintain and improve soil fertility by mulching all crop residues (no burning) and application of organic matter, compost, manure, green manure and/or other techniques
 - Prevent soil erosion by keeping the soil covered at all times, constructing contour borders where necessary;
 - Avoid environmental degradation: cutting down trees unnecessarily, burning of crop remains, or any other organic material; dumping of toxic material (batteries) or burning of plastics;
9. I will try to ensure that no contamination of the certified fields or crops can take place, for example by drift from neighbouring fields.
10. I will not grow any conventional <organic export crop name> in order to avoid parallel production.
11. I promise to sell only the organic production from my organic fields to <name of association>.
12. I promise to follow the organic management training programme as organised by <name association>;
13. In case I observe any violation of the organic principles, I will report this to the internal Inspector or another responsible person of <name association>.
14. I understand that any violation(s) of the organic principles by even a single grower will lead to the exclusion of this production or of the entire production. I understand that I will be sanctioned for deviations
15. I will allow inspections by persons authorised by <name association> and/or <name certifier> and give access to the fields, stores and documents.

Place:

Date:

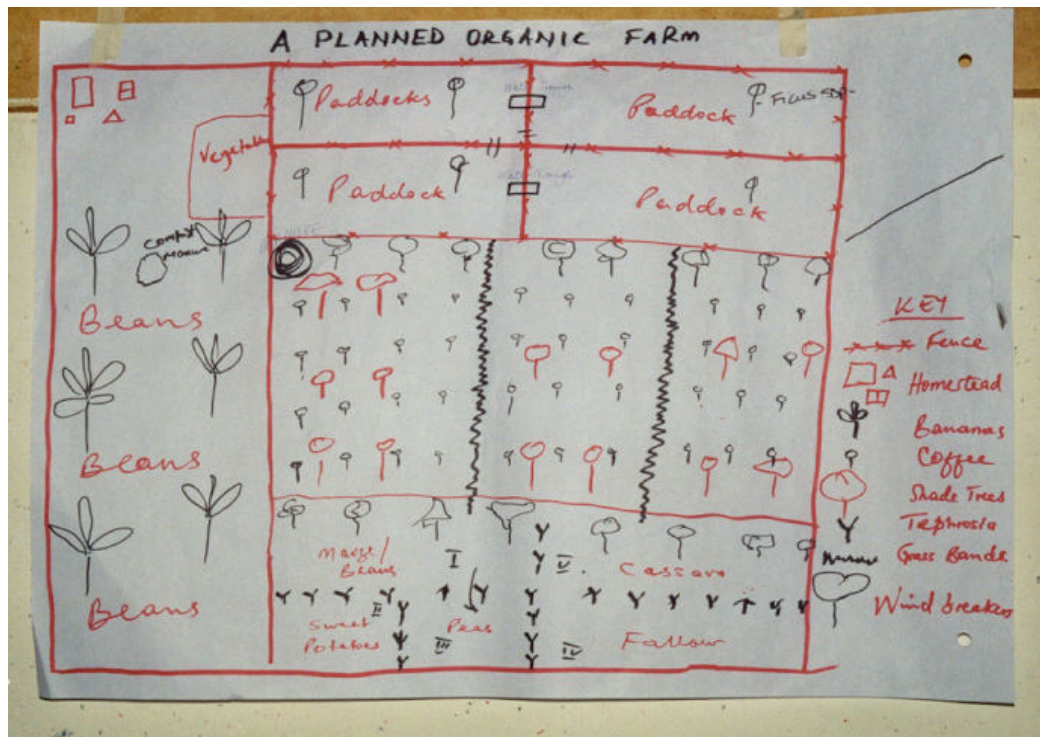
Farmer's name:

Signature:

For < association> name:

Stamp and Signature:

XI. Farmers Field Map



Aha, a farm plan, but what about the scale? (good maps are often difficult to come by).

Source: IFOAM Smallholder Group Certification: Compilation of Results

XII. Farm Entrance Form (example for coffee cooperative)

Fill in actual situation on day of interview.

Farmer name:	
Village name:	Farmer code:
Name of buying station:	Farmer address & Contact details

Farm (all fields, incl. conventional plots)

Field code number (same on field map)	ha	Main crop	Intercrops	Date last use of chemicals* (Product & Month/Year)
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)

Coffee Details :

Animal Husbandry

Plot	Approximate number coffee trees	Date planted Month/Year see field history	Estimated yield in kg's (dry)	Animal (N°)	Description animal husbandry (how are they kept, fodder? Medication?)
Total ac (coffee)					

I, the farmer, declare that this information is correct and that I have understood the conditions for Organic Production. I have also received a copy of the farmer's organic contract.

Date:

Place:

Signature farmer:

I, the field officer, confirm that the above mentioned information is correct.

Signature Internal Inspector

Notes for the Internal Inspector

The Farmer Entrance form should be marked with a black ballpoint pen.

General information

Enter farmers name (maximum three names),

Enter the village name,

Enter the farmer's address & contact details (telephone? Neighbours telephone?)

Enter farmer's code number.

System of farmers code numbering:

Each farmer receives a code number, as for example KD001. The logic is as follows:

- The first letter, K in this example, gives an indication of the basis level-organisation the farmer is member of.
- The second letter is an abbreviation of the village where the farmer lives.
- A unique three digit number. The first farmer to be registered is 001, the second 002 and so on.

Villages are independently numbered.

Information on Farm

a) Give each field a number (all fields under management of the farmer),

b) Enter the size of the field in hectares,

c) Total the area in hectares

d) List all crops on this plot (maybe abbreviations for important intercrops) with main crop & intercrops

e) Note the date of the last application of agro-chemicals if the farmer has been using agro-chemicals in the past three years.

Always ask also what other crops he has grown on same plot before (maybe has grown high risk crop before)

Notes on field situation

The form allows space for comments regarding the borders of the organic export crop fields.

Check the applicable situation. Important note (see also Farmers contract): if a farmer tills a field where no clear borders are existent, all farmers of the respective field must be willing to convert to organic farming. If one or more farmers of such a field are not interested in joining the organic programme, none of the sub-fields can be contracted.

Information on Organic export crop & livestock

For each coffee plot list plot number, app. number of trees (estimation or approximate counting), app. date of planting (for better harvest estimation) and average yield estimation. If yield estimation only available for total farm (not for each plot), just fill in the total estimated yield.

For livestock fill in all animals on the farm with their respective numbers and briefly characterize how animals are kept.

E.g. cows (2): zero grazing, rather big paddocks, Fodder: banana peels & paddy straw, Medication: homeopathic medication, chemical tick control.

Signing

The farmer signs on the left side of the form to confirm that the information given on the form is correct. The FO signs on the right side of the form also to confirm that the information filled on the form is correct and both the farmer and the FO fill in the date when the information was entered on the form.

Remark for farm entrance forms for annual crops:

In case of annual crops it may be better to use the following plot list to record all plots and their history:

Location Plot	Plot N°	Crop 2 years ago	Inputs	Crop 1 year ago	Inputs	Crop this year	Inputs

XIII. Internal Farm Inspection Form

Farmer's name	Producer Code
Internal Inspector:	Date of Inspection
Present during Inspection	

Farm details (all plots, incl. nonorganic plots)

The plots are the same as last year and as registered in internal documentation	<input type="checkbox"/> Yes	<input type="checkbox"/> No in case of new fields, a field history must record last use of unallowed inputs
---	------------------------------	---

Plot <small>see farm entrance form</small>	ha	Main crop	Intercrops	Use of Inputs incl. Seeds (last year) <small>Product, Quantity, Date</small>
Total Farm				

Animal Husbandry

Changes in livestock situation:

Criteria	good	Accept. cond.	Not Accept	Justification/Condition
Animals are well kept and not mistreated				
Mainly organic fodder given				
Mainly homeopathic or natural medication				

Farm and Farm Management

Whole farm is managed organically (all crops)	<input type="checkbox"/> Yes	<input type="checkbox"/> No → first two requirement below MUST be checked
---	------------------------------	---

Criteria	good	Accept. cond.	Not Accept	Justification/Condition
If also non-organic crops: conventional plots clearly separate from organic plots; storage of inputs is separate				o no non-organic crops
If also non-organic crops: organic export crop is not grown also on non-organic plots (no parallel production)				o no non-organic crops
Ecosystem conservation <small>Water systems, hedges, forests, etc.</small>				
Farmer trained in organic agriculture				
Farmer aware of internal organic standard				
General assessment of the farm with regard to sustainability				
Comments				

Management of (crop).....

Activity	good	Accept. cond.	Not Accept	Justification/Condition
Preparation & Maintenance				
Organic Fertilisation				
Weed control				
Pest Management				
Disease Management				
Soil conservation Soil cover, trenches				
Cleanliness on the farm Waste disposal				
Has implemented all required activities				
General assessment of crop				
Harvest Estimation Coffee (this year):				
Comments				

Post Harvest Measures and Processing

Activity	good	Accept. cond.	Not Accept	Justification/Condition
Harvesting No pest protection during harvest				
Processing No auxiliaries, separation of qualities				
Storage No contamination, separation				
Comments				

Risk Management

Risk of contamination from	low	Med.	high	Comments
Neighbouring non-organic fields				
Non-organic activities of same farm				
Industry, motorways, wastewater, etc.				
Others (specify)				
Measure taken to minimise the risk				

Approval Recommendations of inspector (whole farm)

Compliance with previous conditions <input type="checkbox"/> good <input type="checkbox"/> partially/acceptable <input type="checkbox"/> missing/not acceptable <input type="checkbox"/> no conditions last year
Compliance this year <input type="checkbox"/> to approve without conditions <input type="checkbox"/> to approve with conditions <input type="checkbox"/> cannot be approved
Conditions (corrective measures) or Explanation: (→ for severe noncompliances, please complete violation form)

Declaration

The farmer herewith 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

Signature Farmer	Signature Internal Inspector
------------------	------------------------------

Approval Decision by the Organisation

Compliance this year <input type="checkbox"/> approved without conditions <input type="checkbox"/> approved with conditions <input type="checkbox"/> not approved
Additional conditions or sanctions:
Signature Approval Manager

XIV. Farmers List and List of Sanctioned Farmers (Coffee)

Organisation AAA Farmers List 2003/2004														
Farmer's Code	Name and surname of the farmer	Location (address)	Entrance date to organic programme	date of last use of agrochemicals	Total surface of the farm (ha)	surface of the organic coffee area	surface conventional crops (ha)	Harvest last year	Yield estimation 03	Name (Code) of internal inspector	Date of inspection	Result of Internal control	Internal approval	Reason for the sanction and duration
A) List of organic producers														
RB-24	Alfredo Gutierrez	Río Blanco, Villa Rica	01.01.2000	1999	6	5	1(mais)	1500	1700	CM	15.06.2003	OK but control of erosion	Organic	
RB-25	Marco Sanchez	Río Blanco, Villa Rica	01.01.2000	1998	3	2	---	500	500	CM	15.06.2003	OK	Organic	
B) List of producers in conversion														
SM-36	Maria Franco	San Martín, La Maravilla	01.01.2002	April 02	4,5	4	0.5 (mais)	1400	1200	CM	16.06.2003	OK	Conv 2	
C) List of sanctioned producers														
MA-12	Gerardo Mendoza	Montaña Azul, Belo Horizonte	01.01.2000	15.4.03	10	8	2 (mais)			CM	12.06.2003	used chemicals in coffee	none	sanctioned for 3 years
MA-14	Jaime Gonzales	Montaña Azul, Belo Horizonte	01.01.2000	1999	8	6	1 (mais)			CM	12.06.2003	very poor farm management (no improvement)	organic/suspended 1 year	

XV. Violation report

(to be used to report severe violations , by whoever reports the noncompliance)

Datum/Date: _____ Producer: _____

The producer has given the following information

The inspector has observed the following deviation/violation

(Tick the appropriate box)

The following deviation/violation from the standards have been noted:

The producer gives the following explanation:

The following has already been done:

I recommend the following measures to be taken:

Place and date:

Inspector's signature:

I have received this Violation Report:

My decision regarding the violation is

The producer shall be given a warning

The producer will be delisted (de-certified) from the project immediately

The following field/crop will be de-certified from the project

Place and date:

ICS Manager's signature:

The producer has appealed the decision, date:

(Details of the appeal is written on the back side)

XVI. List of Nonconformities and Sanctions within ICS

Problem	Sanction by ICS and what needs to be done
Farmer has sprayed his organic crops	Farmer decertified for 3 years possibly expelled from organic programme check whether products already bought
Farmer has sprayed home consumption crops intercropped with organic crop	Farmer decertified for 3 years possibly expelled from organic programme check whether products already bought
Farmer has sprayed home consumption garden which is far away from organic garden. However, the internal organic standard requires that farmer grows ALL crops organically.	Farmers suspended as punishment for 1 year Sprayed plot recorded in map as conventional with date of spraying Additional training for farmer
Farmer has neglected his farm and has not taken any soil improving measures and has not prepared any compost	Written/oral condition to farmers Additional training If repeatedly discuss if still shall be member
Decertified coffee has been mixed with organic coffee of fellow farmers in village	Find out which lots are contaminated and indicate these lots as "conventional" Inform certifier.
Farmer wants to sell double his estimated yield	Send field officer to investigate in the fields If it is found that farmer has tried to sell product of neighbours etc. farmer is excluded from the project.
Purchase officer has bought from not certified farmers	Find out where respective lots are now, down-grade them as conventional. If already sold → inform certifier. Additional training purchase officer (or dismissal in case of fraud)

Sanctioned and suspended farmers are also inspected annually by internal control.

"Suspended" farmers: remain on approved farmers list with indication "suspended 1 year"

"Sanctioned farmers" are removed from the farmers list on to a list of sanctioned farmer.

XVII. Organisational Chart / Table of Responsibilities

Position	Name	Responsibility
Project Manager	Name	To supervise the whole ICS To allocate resources and employ staff To make contracts with sub-contractors involved in the organic production
Project Supervisor (PS)	Name	To supervise the field officers To develop and implement the Internal Control To communicate with the certification body (CB)
Documentation Officer (DO)	Name	To manage the files generated in the ICS To compile data and reports to CB
Field Officers (FO)	Name1 (Area of work) Name2 (Area of work)	To register and contract Producers To maintain maps and records for the producers To perform Internal Inspections (in other areas as in those where he doing registration and extension) To inform Producers about organic standards and needed improvements in their system To train Producers in organic production
Buying stations responsible (BR)	Name1 (Location) Name2 (Location)	To ensure that only organic products are bought as organic. To clean storages and avoid contamination To sign receipts of organic product
Processing Manager (PM)	Name	To ensure that only organic products are bought as organic. To clean storages and processing lines and avoid contamination/To ensure that storages and processing lines are cleaned To ensure that the processing follows the standards

