GROWER GROUP CERTIFICATION FOR ORGANIC AGRICULTURE

Group certification

The Organic Agriculture movement will not be successful until it reaches the small holder farmers. Previously, Organic Standards and Certification procedures were designed considering only individual farmers, the potential for smallholder groups certification being realized latter. Group Certification has now been introduced and is most popular and acceptable amongst the Indian farming community. Small holder group certification brings the following benefits:

1. It reduces certification cost per acre per year compared to individual farmer certification.
2. Small holder groups gathering farmers with common interests make it possible and easy for government to implement development schemes.
3. It helps the farmers in collective bargaining with buyers.
4. It saves transportation cost incurred by group members in transporting their produce to market.
5. National and international buyers get bulk volume of particular commodity.
6. It ensures a regular supply of consistent quality to buyers and processors.
7. It provides well opportunity for input providers to market among group members.
8. It helps in knowledge /information dissemination among large number of farmers.
9. It contributes to maintenance of social harmony as groups may contain farmers of distinct caste and religion.
10. The growers organized into groups become an easy market for certification agencies.
11. Members can benefits from group training in Organic Agriculture, Biodynamic agriculture, Organic Certification, Organic produce quality, demonstrations, tours, etc.,
12. All groups members can receive advice on seeds, fertility, pests and diseases, post harvest related issues and marketing.
Who can be considered as a group?

1. Only small farmers can be members of the group covered by group certification. Large farms can also belong to the group but have to 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 by the external inspection body.

2. The farmers of the group apply similar production system and the farms should be in geographical proximity.

3. A group may be organised on itself i.e., as a cooperative, or as a structural group of producers affiliated to a processor or an exporter.

4. The group must be established formally, based a written agreement with its members. It shall have control management, established decision procedures and legal capacity.

5. When intended for export, the marketing of the products must be carried as a group.

Principles

1. A substantial part of the inspection work is carried out by internal inspections in the frame work of the internal control system set up by the group.

2. The external inspection body verifies and evaluates the effectiveness of the internal control system and certifies the group as a whole.

INTERNAL QUALITY SYSTEM (IQS)

Group certification is based on the concept of an Internal Quality System comprising of the following:

- Implementation of the internal control system
- Internal standards
- Risk assessment.
An external inspection and certification body should be identified for conducting annual inspection of the individual group / unit. The external inspection agency shall evaluate by checking the IQS documentation, staff qualifications and re-inspecting some farms.

**HOW TO DEVELOP AN IQS**

The following are the minimum requirements for setting up an IQS for grower groups:

- Development of Internal Control System (ICS)
- Identification of producer groups
- Creation of awareness about group certification
- Identification of qualified personnel for maintaining the internal control system
- Give necessary training in production and IQS development
- Preparation of IQS manual containing policies and procedures
- Implementation of the policies and procedures
- Review and improvement of the IQS document for maintaining a harmonized IQS.

**Internal quality system manager (IQS Manager)**

IQS manager shall develop and implement the IQS and would be responsible to organize internal inspections, coordinate between field staffs, approval staff, and the external inspection agency. The IQS manager shall have defined procedures to approve or sanction farmers. The responsibility of IQS manager shall be to ensure that all the standards requirements are fully implemented by the group.

**Internal inspectors**

Adequate number of internal inspectors shall be identified from within the group. The inspectors shall be qualified and well versed with the standards to perform internal inspections.

**Approval manager / committee**

Qualified person or approval committee shall be designated from within the group to take the approval decision. The approval manager/committee shall be well versed with organic procedures of IQS, internal standards and NPOP standards.

**Field officers**
Field officers should be identified among the group, one at each production area. The field officer shall train the farmers by organizing field extension services.

**Purchase officers**

Purchase officers shall be identified who would be responsible for correct purchase of produce from the farmers. The purchase officer is required to be well versed with IQS.

**Warehouse manager**

If there are separate warehouses, it may be necessary to have a warehouse manager who would be responsible for handling the produce. He / she shall be well versed with the procedures of IQS for proper implementation.

**Processing manager**

If a processing unit is operated by the IQS operator, it may be necessary to assign a processing manager. The processing manager is required to be trained in the handling procedures. When the processing of the produce is being organized in a company, the latter needs to be inspected by the certifier and would be responsible for processing according to the internal handling rules. In such case, the processing unit shall have a formal contract with the grower group.

**Internal Control System (ICS)**

An internal system to regulate the functioning of any group is known as Internal Control System.

Internal Control System is implemented to manage and apply Internal Quality System Policy, Internal Standards and Internal Controls at every step of group certification process. The main objectives accomplished by ICS are as under:

- Creating awareness for group certification and identification of farmers.
  Registration of farmers for ICS.
- Training and technical services to the members.
- Pre-audit, documentation and record keeping.
- Internal inspection.
- Registration of groups members with the certification agency and their audits and certification.
- Procurement and marketing.
The following activities are taken up under ICS:

1. Identification of Group Members
2. Creating awareness for Certification Process
3. Application for Registration
4. Review of Application
5. Registration and Contract
6. Pre-Audit and Documentation
7. Training and technical Know-how to the Group Members
8. Training of Internal Quality System Members
9. Internal Inspection
10. Inspection, Review and Approval by Certification Agency
11. Certification
12. Procurement and Marketing

Once a farmer becomes a member of the group, he is governed by ICS. The following procedures are adopted for carrying out these activities:
**Awareness and Identification:** Through awareness programs, farmers interested in organic farming are identified.

**Farmers Registration and Contract:** Every farmer is registered individually as a member of the group. Every member is allotted a unique code number, which is used in all future references. A contract is signed on behalf of group by the management committee with the member giving details of terms & conditions.

**Pre-Audit Operation:** After the registration and the contract, farmer's basic details are collected and entered into a database. In this database, farm's map, land details, land offered under organic cultivation, history of the farm production during past three years along with details of the earnings, are collected.

The responsibility for pre-audit operations is then given to an inspector appointed by IQCS office. Prior information of the inspection is given to the farmer personally or through letter/phone. The inspector does the verification of information collected.

**Training and Technical Services to the Group Members (NPOP Sec.517):**

Training and technical service programs are designed to cover different aspects of the certification. During the training, a farmer is trained in such a way that he is able to get the certification easily after the completion of conversion period. Following points are covered under the training programs:

1. Production of fertility inputs from on-farm resources.
2. Production of pest management inputs from on-farm resources.
3. Mechanical, physical, cultural and biological methods of weed control.
4. Training about good agricultural practices, seed sand planting materials
5. Knowledge dissemination on IQS and internal standards.
6. Training about record keeping.
7. Training to the group members about the organic program and its standards under which they have been registered.

**Training to IQS Members (NPOP Sec.5.16):** To impart knowledge and to increase the efficiency of officials responsible for IQS management, regular training is provided. Besides, they are also encouraged to take part in training programs conducted by other government agencies and resource organizations.
Internal Inspection (NPOP Sec. 5.11): Internal inspection is an important step in certification process. Each group member must be inspected at least twice a year whereby even the minute changes at the field level are noted and compliance for standards are also checked.

For internal inspection a Check List is prepared as per organic standards applicable to the group. The internal inspector records their observations according to their check list.

After the internal inspection is over, inspector signs an exit interview with the member farmer. Following points must be kept in mind during internal inspection:

- Details of crop and farm activities.
- Seed/planting materials.
- Fertility management inputs.
- Pest, disease and weed management.
- Irrigation management
- Packing and storage.
- Record of stock and dispatch.

Action taken on the non-compliances noted during previous inspection. The internal inspector submits his/her report to IQS Coordinator. The recommendation of internal inspection is included in certification process by certification agency.

Registration with Certification Agency and External Inspection (NPOP Sec. 5.12):

After confirming that a farmer group is producing the crop according to the applicable standards. Then the group is registered with an accredited Certification Agency. As per this ICS, the group is certified for following regulations and standards:

- NPOP - INDIA
  (National Program for Organic Production)
- NOP - US
  (National Organic Program)
- EU - Europe
  (Council Régulation - Europe)

Procurement and Marketing (NPOP Sec. 5.13, 5.18, 5.19):
In grower group certification system, all members have to sell their produce in one lot. The price for the produce can be decided in consultation with individual members.

Estimated yields are assessed in advance on the basis of net sown area and past records. Farmers are informed at least 15 days prior to the procurement. In case of any confusion regarding certification status of the produce that produce is kept separately till the dispute is resolved.

The certified organic and in conversion produce is procured, stored and transported separately to avoid coming.

The Internal Quality System has defined Internal Standards. These standards are applicable to all the members and should also be according to the applicable Organic Standards adopted by the group for certification.

- **Production Unit:** Any farmer wanting to become a member of the group, must comply with following conditions:
  - Production unit must be in the same geographical area.
  - Members of a group must have same cropping pattern.
  - Proper measures must be taken to avoid contamination from environment, polluting sources and sewages lines or nullahs.
  - There must not be any GMO crop in or around the field.

**Part Conversion:** A group member can opt for organic production only on a certain part of his/her land. In this case the crops under organic and conventional systems must be different. A buffer zone must also be created between both the fields. The harvesting, procurement, processing, storage and transportation of two types of crops must be done separately.

**Conversion Period:** The conversion period for a member / farmer is dependent on the last use of prohibited substances. This information must be passed on to the certification agency by IQS.

The certification agency should be informed of all deviations. In such cases, the decision of the certification agency would be final and further actions will be taken accordingly.

**Farm Production Norms**
Seed and Planting:

• A farmer must use organic seeds and planting materials only. In case organic seeds are not available, a farmer can use untreated conventional seeds but a documentary proof has to be kept in record for the non-availability of organic seeds.
• Group members can purchase organic seeds from farmers who are already in the organic farming for the past three years or more.
• The farmers can exchange seeds among themselves from those who are not using any kind of prohibited substances.
• No member of a group is allowed to use GMO seeds on the farms registered for organic production.

Nutrient Management

Nutrient management will be based on recycling of farm wastes.
Corp rotations will be designed and implemented to improve soil fertility.
Members can use inputs purchased from outside. But its source, type and status must be recorded for verification by the internal inspector and the certification agency.

Soil Management:

Inputs prepared organically or inputs which are organic in nature (according to method, rules & regulations of organic certification) shall only be used for soil amendments.

Pest Management:

Physical, mechanical, biological and cultural methods will be utilized for pests and disease management.
Farmers will disclose source, type and status of pesticides prepared on-farm or brought from outside to the Internal Quality System and Certification Agency.

Weed Management:

• Weed Management will be based on cultural, mechanical and biological methods.
• Weeds will be utilized for sustainable farming, that means weeds can be used for making compost or as an animal feed.
• Chemical weedicides should not be used.

Drift Management:
Adequate buffer zone will be created between the two different fields (organic and conventional) to avoid contamination through drift. Trees shall be planted around the field as a fencing.

Harvest & Post Harvest
1. Harvesting, primary processing and storage for organic, transitional and conventional produces shall be done separately.
2. Harvesting for organic, transitional and conventional crops shall be done separate tools or machines.
3. New packaging materials or materials cleaned organically will only be used for packaging of the organic produce.
4. Lot numbers on every step of harvesting, processing, packaging and storage will be given.

Risk Management:
The measures adopted to avoid contamination and comingling at Critical Control Points during production is known as Risk Management.
To maintain integrity of organic operations, a plan is required. This plan includes steps to be taken at all critical control points.
Contamination and comingling can take place either on the farm or outside. It is therefore necessary that efforts are made to prevent contamination and comingling in the complete organic value chain or chain of custody.

On-farm Contamination Control: To prevent the comingling and contamination on the farm, following measures shall be taken:
Adequate buffer zones between conventional and organic farms will be maintained.
Operator will use separate tools and machines under split production systems.
Bunds will be made to prevent these flows of water from conventional to organic farms.
Lot numbers will be given to the produce at different stages like harvesting, processing, packaging and storage etc. to prevent comingling.
New bags will always be used for packing the farm produce. In case old bags are to be used, they will be used only after cleaning them well with Ritha seed extract or any other approved material.

**Off-farm Contamination:**

1. For contamination from outside measures will be taken.
2. For possibility of contamination from neighbour farm.
3. For possibility of contamination through drift
4. For possibility of contamination through up or down stream flow of water.
5. For possibility of contamination through waste disposal system.
6. For possibility of contamination from other factors like road or a factory located nearby.

Any activity by a member that affects the Organic Certification of the Group is known as Non-compliance. The action taken against such members is known as Sanction.

During the internal inspections, for any non-compliance, necessary corrections will be made. Group Committee is completely authorized to decide about the procedures and the period of sanction depending upon the nature of non-compliance. Following criteria may be followed for sanction:

For any member found to be using restricted or prohibited materials without information, the member may be expelled from the group permanently or may be asked to go through full conversion period once again.

Any member found to be using restricted or prohibited materials in case of emergency, the certification agency is authorized to decide the sanction.

In case of 70 percent or more members file a complaint against one particular member and if the same is found guilty, he may either be expelled from the group of the area under IQCS.

Any member found to be practicing comingling, the group member may be expelled from the group either for a period of six months or more.

Any member misbehaving with the officials of ICS, a written warning will be given. In case of, subsequent complaint, the member may be expelled from the group.
Any member found to be absent without intimation for any training or any other such activities organized by the ICS, written warning will be given. Repetition will be enough for expelling the member for six months or more.

Any member found to be holding back any information required by the certification agency, may be expelled from the group for a limited period.

Conflict of Interest

All the designated officials of IQS and ICS should not have any reason to provide favours to any member/s. Any such reason and its consequences are known as Conflict of Interest.

Following provisions have been made to avoid conflict of interest:

No information shall be withheld by the members of the group or officials from the certification agency.

Officials will not favour any particular member.

- Designated Internal Inspector/s will not inspect the farm/s of any such member/s who are either their relatives or close friends.
- No officials will give technical advice to any group member/s for monetary or other gains offered to them.

Operating Documents

Records maintained for Group Certification under ICS are known as operating Documents.

- A map showing the location of members will be drawn. In this map all the farms and crops will also be recorded. Any possibility and source of contamination will also be clearly indicated in this map.
- A list of members with their code no., total crop area, net sown area, date of registration, last date for the use of prohibited material, date of internal inspection, name of internal inspector, and result of internal inspection etc. will be prepared.
- A similar list for in-conversion members shall also be prepared separately.
A list of sanctioned farmers with the cause of sanction and the sanction periods will be maintained.

**Farm Level Records**

- Application for Registration
- Contract for IQCS
- Farm Details
- Farm Map
- Seed & Planting Materials
- Inputs for Fertility Management
- Soil Amendments
- Inputs for Pest & Disease Management
- Weed Management
- Estimated Production
- Harvest & Post-Harvest Operations
- Production and Storage
- Delivery and Transport
- Use of Farm Equipments
- Contamination
- Control Measures
- On-Farm Input Production

**Source: Prof. Dr.K.K Krishnamurthi, President, ISCOP**

Rasi Building 162, 163, Ponnaiyarakpuram, Coimbatore-641 001, Tamil Nadu, India.

Phone: 0422-2544199; Mobile: 9443243119

E-mail: profdrkkk@yahoo.com