

Recommendation for Organic Group Certification

This description outlines the principles of group certification and how, when properly managed and inspected, this procedure complies with the requirements of the National Organic Program Regulations, including 7 CFR 205.403.

1. Group Certification through a Single Organic System Plan

A unified group of similar producers can qualify as a single certified operation if they adhere to and are a part of one Organic System Plan (OSP), are supervised through a single Internal Quality System (IQS), maintain centralized production and sales records and have coordinated marketing. Each producer or participant may operate a sub-unit or plot under a production unit of the certified group operation. A very simple group consists of a single production unit with a few plots, while a more complex group contains multiple production units. Plots or sub-units within a production unit must be within geographic proximity, but need not be contiguous. Each production unit within a production or handling operation has defined locations, practices, management and/or products.

2. Production Unit

Production units are specific portions of an organic operation and may include any sub-units. The Accredited Certification Agency (ACA) must inspect every production unit annually. The OSP must identify the criteria used to designate a group of sub-units as a single production unit and must be approved by the ACA. Each sub-unit is operated by a member of the group. Each production unit is managed by managers or field agents of the certified operation. All operators and responsible personnel must be fully trained to the OSP. Production unit managers or field agents must check all sub-units at least annually to ensure that the OSP is implemented. Any handling facility is considered a single production unit that must be inspected annually.

Criteria to designate a group of sub-units/plots as a single production unit include all of the following that are applicable: geographic proximity; common input supply; coordinated product collection through a central facility; a production unit manager or field agent who is responsible for managing operations, providing extension services, monitoring and enforcing the functioning of the internal quality system and organic

system plan; unique product or variety, time of harvest, or other distinguishing characteristics; similar production methods; and similar soil composition, water source, slope, topography or other physical features.

3. Internal Quality System

Every certified operation is required to have an Internal Quality System (IQS) for monitoring and control to ensure that all group activities are compliant with the OSP and the NOP. The IQS is an integral part of the OSP and therefore a component of the group's certification requirements that are subject to annual inspection. The IQS serves as an internal training and extension service to ensure that all participants understand the Organic System Plan, as well as undertaking an annual internal surveillance or internal audit to ensure that all participants are implementing the plan as required. The IQS includes a documented management structure; documented internal evaluation and/or audit protocols; appropriate maps/sketches; a complete list of group members; farm/field, production unit or processing records; signed member agreements to comply with the OSP and permit inspections; a mechanism to remove non-compliant group members; documentation of enforcement actions taken; procedures to accept and conduct a site visit of new members; and risk assessments of the group and its production unit(s). The IQS does not in any way take the place of the ACA or the requirement for inspection by the ACA.

The ACA must have a clear sanctions policy in the event of non-compliance by the group and/or its members. Failure of the internal quality system to detect and act on non-compliances must invoke sanctions on the group as a whole. This includes provisions for remediation of minor non-compliances by individual members, up to withdrawal of certification from the group where the internal quality system has been found to be ineffective at preventing major non-compliances.

4. Inspection Protocols

Specific protocols are required for the ACA to perform effective on-site inspections of a group certified operation. The inspection must include a thorough audit of the functioning of the Internal Quality System through document review, interviews with managers, field agents and operators responsible for various aspects of the OSP, and examination of every production unit, facility and site at least annually. The inspection includes an assessment of the risks to organic integrity within the group

and the environment in which it functions. The methods and results of the IQS must be compared with the results of the ACA inspection to determine whether the IQS has adequately addressed the compliance of operators.

Inspection of a production unit that includes sub-units or plots must include on-site inspection of a statistically significant sampling of the sub-units or plots. The number of sub-units selected for each annual on-site inspection should be based on ISO-compliant methodologies that include appropriate risk-assessment and random selection of a portion of the sampling. Inspection of a sample of sub-units/plots within a production unit is undertaken to evaluate the effectiveness of the Internal Quality System. Records of the sampling inspections are kept by the certification body to ensure that over time the inspections are representative of the sub-units/plots as a whole and take into account any previously identified risks.

Inspectors must have documented qualifications to undertake the inspection and evaluation of group entities and internal quality systems through a combination of training and experience.

5. Accreditation Criteria

Additional accreditation criteria based on the group certification procedures outlined here should be included in the accreditation review and site evaluation of ACA's that certify group entities under the NOP Rule. An ACA that can document the necessary expertise in group certification, as well as having procedures in place to verify compliance with the NOP by a group entity, should have group certification included in its scope of accreditation. Examination of these procedures should be included in site evaluations of an ACA that includes group certification in its scope.