



Certification System  
**NCO GROWER GROUP Certification  
Criteria**

**CODE**  
**IS Grower Group  
Certification Criteria V6  
Effective 1.6.2023**

## Criteria

### Grower Group

- is an organised grouping of small-scale producers (referred to as growers) with similar farming and production systems. A group can only consist of members who are farmers and comply to EU 2021/279 Art.4. A certified grower group must be a legal identity which provides definition and oversight to the grower group and its certification requirements.

### Grower Group Certification

- is an organic certification of the whole grower group operation, including the internal control system and all grower group members. Grower group members may sell organic products only through the group
- Complex farming systems, complex processing and end of chain wholesalers, exporters and traders must be inspected and certified separately and cannot be included in a grower group certification. Any individual operation identified to be of a size/scale, diversity of activity, and/or separate export streams will be excluded from the grower group certification and assigned an individual certification identity number and process.

### Internal Control System (ICS) –

- an effective documented group internal quality assurance system developed and maintained by the grower group. Internal Control System (ICS) is integrating systematically all sites and production units under the organic certification. The group's Internal Control System (ICS) shall be based on internal surveillance procedures for ensuring operation's compliance with organic regulations and standards. The certifier's annual external onsite inspection and assessment mainly focuses on evaluating the effectiveness of an Internal Control System (ICS).
- The Internal Control System (ICS) is a combination of ...
  - organic compliance management,
  - record keeping systems, and
  - inspections



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## 1. Scope

- 1.1 The grower group must be a legal personality
- 1.2 The certified legal personality shall be the group as a whole and must agree to be legally bound by written contract with NCO.
- 1.3 The maximum size of a grower groups is 2000 members under one legal personality.
  - a. Above 2000 members, new legal personalities must be formed and separate certification applies.
- 1.4 The group is certified as a group. Produce from that group can only be sold through the group's legal entity.
  - a. Individual members of the group must not represent themselves as certified other than through the group.
  - b. Certified sales can only go through the ICS
- 1.5 Grower members shall practice similar farming systems.
- 1.6 All members or units must:
  - a. Operate together under the group's Organic Management Plan
  - b. Work in compliance with the Internal Control System (ICS)
  - c. Document each step of the group's supply chain from farm plots to end product
  - d. Produce similar products
  - e. Be within geographical proximity
  - f. Be unified under a training program
  - g. Be internally inspected ones per calendar year (100% internal inspection for each grower and production unit)
- 1.7 The grower group must have a written contract with each member operator
- 1.8 Any production unit that processes or consolidates products for more than themselves and one other member must be inspected annually
- 1.9 Production units must be integrated in the growers ICS.
  - a. Production units are any site where produce is grown and/or handled post-harvest
  - b. The person responsible for each production unit will sign a contract to become a member of the grower group.
  - c. Production units must be internal ICS and external NCO inspected
- 1.10 Grower Group certification is monitored by annual external inspection by the certifying organisation NCO.
- 1.11 ICS documentation and correspondence with NCO must be in English
- 1.12 The group and ICS staff must undergo continual competency training on ICS compliance

## 2. Requirements

- 2.1 Grower Group certification is based on the implementation and maintenance of an organisational management plan which includes a framework for an internal control system ICS covering all growers and production units.
- 2.2 The ICS must protect the organic integrity by
  1. Verifying compliance for each grower and production unit



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2. Managing 100% of internal inspections of all growers and production units to verify compliance on behalf of the certification body (Shared Surveillance)
  3. Report and act upon noncompliance within the group according to ICS procedures:
    - If the ICS is identified as not having detected or acted on an internal noncompliance, NCO will separately raise a noncompliance, one for the affected group and one for the ICS.
    - If the ICS fails to act on noncompliance's issued by NCO, suspension or decertification will be applied to the group.
    - Wilful violation will result in decertification
- 2.3 If during internal inspection any member or production unit that wilfully violates the organic standards shall not be permitted to re-join the group until NCO approves measures taken to ensure that the violation is not repeated.
- 2.4 Where the ICS has failed to detect or act on a noncompliance committed by a group member, NCO will separately raise a noncompliance for the ICS and apply sanctions to the group as a whole, including, in case of serious deficiencies, the withdrawal of certification of the entire village where the noncompliance occurred

### 3. ICS Manual

The ICS structure and content must be confirmed in an ICS MANUAL covering at least

- 3.1 Organizational Structure including staff
- 3.2 Group's supply chain (flow chart) from plot to end product including all production units
- 3.3 ICS Procedures
- 3.4 ICS documentation
- 3.5 Training
- 3.6 Detailed Grower Data Base

### 4. ICS Staff

The ICS staff is the intermediary group's representative for the certification body and will act as the coordinator of the group and is responsible for the group's compliance

- 4.1 The group must have an organisational chart defining staff roles and responsibilities
- 4.2 An ICS must have sufficient and competent staff represented in the growers organization chart
- 4.3 All staff must show competencies for the tasks and responsibilities
- 4.4 All ICS staff must participate in ongoing training for ICS and standard requirements
- 4.5 ICS shall develop a performance review for each ICS staff member
- 4.6 Following ICS staff must be developed:

Staff Categories	Duties
ICS Manager	<ul style="list-style-type: none"> <li>- Perform the overall management functions and supervision of all staff roles</li> <li>- Define and implement all ICS procedures</li> <li>- Ensure that each group member is inspected and verified at least once</li> </ul>



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	<p>a year.</p> <ul style="list-style-type: none"> <li>- Is the contact person for the Certification Body, including coordination of External inspection.</li> <li>- Report noncompliance and corrective actions to the Certification Body.</li> </ul>
Internal Inspectors	<ul style="list-style-type: none"> <li>- Qualified internal inspectors carry out the internal inspection based on ICS procedure and checklist.</li> <li>- Internal inspectors inspect every grower group member annually, including all production units and unregistered plots</li> <li>- No consulting and extension services will be provided by the internal inspector during inspection</li> <li>- Report noncompliance to ICS</li> </ul>
Verification Staff	<ul style="list-style-type: none"> <li>- Verify the internal inspection reports and determine the group's internal decision on whether a group member is approved.</li> <li>- Records decisions on the group database (compliance or noncompliance of each grower or production unit).</li> </ul>
Operational Staff	<ul style="list-style-type: none"> <li>- Implementing ICS procedures and documents including data and compliance management for traceability on the entire groups supply chain</li> </ul>

4.7 Requirements for ICS personnel shall include:

- a. Fluency in the local language
- b. Reading & writing skills in English
- c. Understanding of the applicable all relevant organic standards
- d. Familiarity with the local agricultural production
- e. Understanding of relevant critical control points in the supply chain.
- f. Understanding of the ICS procedures and regulations
- g. Current declaration of conflicts of interest and confidentiality statements for all ICS staff
- h. A contract specifying employment parameters including a clause that defines staff member rights and responsibilities in reporting noncompliance.

## 5. ICS Procedures

The ICS Manual includes systems and procedures for certified activities, and it identifies recordkeeping and inspection trail systems for all production units, facilities, or sites included in the grower group system. At least the below listed procedures must be established and implemented under the ICS:

### 5.1 Risk management

procedure for assessing and managing risks associated with the group, including a documented set of critical control points for all activities of the operation

### 5.2 Compliance decision

A procedure which documents how decisions are made, particularly in relation to evaluating the group's compliance to the Standard and setting noncompliance

### 5.3 Noncompliance and Sanction

A procedure which illustrates the management and recording of noncompliance and resulting sanctions, including a procedure for ensuring that the Certification



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Body is notified of any noncompliance. Actions on noncompliance and violations per grower, subgroup, or group to ensure organic product integrity

Including notification to the certification body on any non-compliance

5.4 Adding new growers

A procedure for accepting new members to the group (linked to internal inspection procedure and compliance assessment)

5.5 Internal inspection procedure

A procedure for managing annual internal and follow-up inspections for all group members, as well as new entry inspection

5.6 Conflict of interest

A documented procedure to identify and manage conflicts of interest within the group;

5.7 External inspection procedure

A procedure for managing annual external sample inspections including witness inspections

5.8 Training

A procedure on regular and ongoing training and competency building of staff and grower including position specific competency development and training

5.9 Traceability

Entire supply chain traceability from certified and non-certified plots to end product including all production units and Critical Control Points.

5.10 Input

A procedure on identifying the need for inputs (seeds, fertilizers, tools, etc.) and approval for supply to individual growers, subgroups, or entire groups

## 6. ICS Documents

6.1 Organic Management Plan covering

- a. Production and processing within certification scope of group

6.2 Internal Standard

- a. Concise summary for internal use reflecting all standard requirements applicable to the group referring to NASAA Standard, EU Regulation, USDA NOP, JAS

6.3 ICS staff documents

- a. Conflict of Interest forms
- b. Confidentiality agreement
- c. Contracts
- d. Competency profiles

6.4 Grower documents

- a. Grower Entry Form, including
  - o Land and input history
  - o Land and yield data
- b. Grower contract
  - o confirming the member operator's understanding and compliance with the relevant Standard,
  - o outlining the consequences of non-compliances and sanctions;
  - o permitting internal ICS and external NCO inspections.
  - o requiring growers to report any changes that might affect the



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- o operation's compliance
  - o The grower should have received a copy of the contract they have signed.
  - c. Grower specific maps
  - d. Overview map
  - e. Flowcharts of supply chain
- 6.5 Grower Group Member Data Base, including
- a. Names of all group members
  - b. All production units including address and contact person
  - c. identification numbers for each growers
  - d. Date when each grower/unit joined group (start of conversion period)
  - e. Hectares certified
  - f. Certification status per plot/area (In conversion, Organic, Suspended)
  - g. Non registered plots including hectares owned by grower/family
  - h. Crops produced/processed
  - i. Yield (potential)
  - j. Harvest/collection
  - k. Sale
  - l. Date of Internal inspection
  - m. Name of Internal inspector
  - n. Compliance result of last internal inspection
  - o. Date of External inspection
  - p. Compliance result of last external inspection compliance
  - q. Risk based additional inspection needed
- 6.6 This list must be kept up-to-date (including for passive growers).
- 6.7 Internal Inspection checklist
- a. Referring to all organic standards and regulation requirements the group is certified to
  - b. Covering all activities including non organic of each grower and production unit
  - c. Listing non compliances
- 6.8 Operation documents
- a. Noncompliance register for all growers and production units
  - b. Traceability documentation system
  - c. Compliance and sanction records

## **7. Conversion to Organic**

- 7.1 Each land plot and each grower must go through a conversion period before the harvest can be claimed organic
- 7.2 Each land and grower must be internally inspected to start the conversion period
- 7.3 The conversion period starts with the entry into the grower group and full compliance to the organic management plan
- 7.4 ICS conversion management
  - 7.4.1 ICS must provide evidence that no prohibited inputs have been applied on land for 36 months
  - 7.4.2 ICS must verify and record management practices in the conversion period ensuring



7.5 External inspection is usually required prior to new growers and production units achieving full organic certification with NCO for the relevant programs. If new growers and or production units are to be added in between external inspection, records verifying procedures must be approved by NCO before any produce from the new growers can be included in certified organic finished product.

## **8. Internal Inspection**

- 8.1 Internal inspectors must comply to the ICS staff requirements and must have the competency in auditing. Agricultural knowledge and group systems
- 8.2 Internal inspectors shall carry out at least one annual inspection visit to each grower including visits to all fields and facilities associated with that member including non registered plots
- 8.3 Internal inspector shall identify and inspect grower and production unit specific critical control points
- 8.4 Internal inspections must document all non-compliances and verification of corrective actions.
- 8.5 The ICS must communicate in writing with individual group members regarding all irregularities and minor non-compliances found, including the corrective actions imposed with agreed time for completion.
- 8.6 The ICS must maintain records of all non-compliances detected in the group including the agreed time for completion of corrective actions. Instances of noncompliance by a group member must be reported to NCO.

## **9. External inspection**

- 9.1 NCO must conduct annual inspections of the entire grower group supply chain
- 9.2 NCO external inspection verify
  - a. The group's organic management system plan
  - b. ICS implementation and compliance
  - c. ICS effectiveness to protect organic product integrity
- 9.3 Prior annual external inspection:
  - a. The ICS must submit current Management Plans and updated grower group data base
- 9.4 External inspection course
  - a. Opening interview
  - b. ICS Inspection including implementation of all procedures and documentations
  - c. ICS 100% annual internal inspections verification
  - d. Risk based selection of externally to be inspected growers
  - e. Witness audit(s) of an internal inspection(s)
  - f. Exit interview