

CERES Policy

Group Certification and Internal Control Systems (ICS)

1	Aims	This policy establishes guidelines for smallholder group certification by CERES.
2	Background	The cost of certification is a serious obstacle for many growers, especially smallholders, making access to organic markets for them difficult. Since many years, group certification with internal control systems has been developed as an alternative. These systems have now obtained a certain level of official acknowledgement.
3	Normative framework	<ul style="list-style-type: none"> a. Regulation (EC) 834/07 and JAS prescribe that each single operation, independent from its size, must be inspected individually by an independent certification body. Nevertheless, on 6th November 2003, the European Commission published a "Guidance document for the evaluation of the equivalence of organic producer group certification schemes applied in developing countries" (AGRI/03-64290-00-00-EN). As the name says, this is guidance, not a legally binding regulation. Nevertheless, it is now being recognised as a semi-official document. For the time being, group certification is not "compliant" but only "equivalent" to Regulation (EC) 834/07 and can therefore not be implemented in EU member countries (see also CERES Policy Third Country Certification). b. The German Accreditation Agency DAkkS has developed "Requirements for certification bodies which certify organic products in third countries according to production rules and control measures recognised as equivalent to Regulation (EC) No. 834/2007 and it's implementing rules", which further specifies requirements of the above-mentioned EU Guidance c. In Nov. 2008, the US National Organic Standard Board (NOSB) published a Final Recommendation for "Certifying Operations with Multiple Production Sites". As long as there is no final ruling by the NOP on this issue, this Recommendation must be considered as the binding normative reference for grower group certification according to NOP. d. CERES has been informed by the Japanese Ministry of Agriculture (MAFF) that group certification is allowed for organic grower groups according to JAS. e. From 2001 to 2003, the International Federation of Organic Agricultural Movements (IFOAM) organised three workshops on group certification, with stakeholders from all over the world. The result was a "compilation" document (IFOAM ICS Compilation 03-03), which is a rich source of ideas, experiences, and proposals for producer groups and certifiers.
4	Terms	<ul style="list-style-type: none"> a. Internal Control System (ICS): is a tool for quality assurance, where the external certifier delegates part of his work to the organisation. The proper work of the certifier is then to evaluate the ICS' performance. b. Group: Groups can be organised on their own, but also by external entities, as e.g. processing or trading companies. They must have a formal structure, and, as a minimum, internal exchange of information. For further details, see Section 5.1. c. Re-inspection rate: The sample, which is inspected by the external certifier, to evaluate the ICS' performance.
5.1	What is a farmer group?	<p>This question is not always easy to answer. In some countries, e.g. China, there are many different arrangements between landowners, (main) leaseholders, sub-leaseholders and farm workers which complicate the assessment if an operation is to be handled as a single company, a group of farmers to be certified under a group certification scheme, or a group of farmers where each individual farmer needs to be inspected externally.</p> <p>Criteria to be considered in this regard include:</p>

	Criterion	Can serve as argument for placing the operation in the category of a...	
		farmer group if...	single company if...
	Land distribution	land is (partly) scattered	land is in a single piece
	Payment for land use	farmers, leaseholders, or sub-leaseholders pay for leasing the land (in cash or in kind)	no such payments exist
	Payment for production or work	farmers, leaseholders, or sub-leaseholders sell the products which they grow on the land	workers are paid per hour, day, week or month (or on a piece rate)
	Purchase of inputs (seeds, fertilisers, plant protection etc.)	farmers pay for inputs	inputs are purchased centrally and applied by workers
	Farm management decisions	are mostly individual	are mostly centralised
		For this assessment, CERES has developed a questionnaire which should be completed by the operator and then verified by competent CERES staff. The final decision if an operation is to be considered a group or not, will be made by a competent evaluation officer with the ability to ponder different aspects. This procedure needs to be followed only in case of doubts.	
5.2	For which groups ICS can be used? (In addition to the criteria discussed under 5.1)	Obviously, any producer group can and should have its tools for quality assurance, independently from requirements of, or acknowledgement by external certifiers. In the context of group certification, however, CERES requires that a group must fulfil the following conditions, to use an ICS as a tool for group certification:	
		<ul style="list-style-type: none"> a. The group must be an "entity" or "person", operating under a common Organic Management Plan (OMP) b. The group uses centralized processing and storage units; it can sell certified products only as a group; members are not authorized to sell certified products on their own c. There is no minimum number of members in a group. Already 2 members can form a group. d. Producers must be within geographic proximity and have similar production and recording schemes. e. Producers must use the same farm inputs, purchase of farm inputs must either be directly through the group, or under control of the group f. The group must be structured, although not necessarily legally established, and have at least two meetings per year, where issues of organic production and marketing are discussed, among others. 	
		CERES uses the following definition of smallholders:	
	Crop	Maximum size for a "small" farm that can be part of a sample-based group certification¹⁾	Maximum size for a "medium" farm, for which a short OMP / Inspection report can be used^{1) 2)}
	Vegetables medicinal and aromatic plants, tobacco and other high value intensive crops	5 ha	10 ha

		Tea, intensive fruit orchards, potatoes	6 ha	30 ha
		Coffee, ginger, cocoa	30 ha	70 ha
		Cereals, pulses and other extensive field crops	50 ha	100 ha
		Beekeepers	500 hives	800 hives
		<p>1) These areas refer to the certified crops, not to the entire farm</p> <p>2) The "medium" farms with sizes in between these columns, must be inspected individually, but the short version of the OMP respectively inspection report may be used. Farms above this "medium" size must also be inspected individually, but the long version of the OMP / inspection report must be used. These individually inspected farms cannot be considered for calculating the sample size for the smallholder group.</p> <p>For more details, refer to Work Instruction 4.2.3.0.</p> <p>The NOSB recommendation emphasizes that producer groups must operate according to a common "organic system plan" and use the same kind of inputs, sharing the same input supply!</p> <p>We believe that group certification should be possible anywhere in the world, where these conditions are fulfilled. Nevertheless, groups should be aware that some EU authorities keep strictly to the EU guidance and allow group certification only in countries defined as "developing countries" by the OECD (i.e. all countries listed in http://www.oecd.org/dataoecd/23/34/37954893.pdf).</p> <p>ICS can be applied for crop or livestock production, including beekeeping.</p> <p>Regarding producer groups that do not fit in this scheme, or for which CERES must conduct 100% external inspections for other reasons, please refer to Policy 4.1.3.1.</p>		
6	Internal regulation; ICS Manual	<p>a. The group must have written internal rules (also called ICS Manual), which can be brief. Rules must include the basic requirements of the respective organic standard(s) for the specific crop(s) and local conditions, but can, of course, go far beyond this.</p> <p>b. These rules must include a catalogue of sanctions for different infringements of the rules. The group should work out sanctions, although the certifier must check, whether the infringements are adequately defined.</p> <p>c. Furthermore, the internal regulation should include:</p> <ul style="list-style-type: none"> ○ A short description of the organization and its structure ○ A description of organic management of the respective crop(s), including potentially critical points and their management ○ A short description of responsibilities and duties ○ A short description of the steps, which the product undergoes from farm to final sale, including the measure taken at each step to assure traceability and avoiding infiltration of non-organic products, and the persons responsible at each level. <p>d. (Reference to) Templates of the forms to be used (farmer contract, farm registration form, internal inspection report, etc.)</p>		
7	Internal inspectors	<p>a. The group must have enough internal inspectors.</p> <p>b. Internal inspectors must be adequately trained. They must have appropriate knowledge of:</p> <ul style="list-style-type: none"> ○ Their role as inspectors ○ The essential requirements of organic farming standards ○ Management techniques of the respective crop(s) or livestock ○ Inspection procedures ○ Sanctions established by the group ○ Report writing. <p>c. Besides their knowledge, internal inspectors must have a high level of personal integrity and reliability.</p>		

		<p>d. Conflicts of interest:</p> <ul style="list-style-type: none"> ○ If internal inspectors are producers themselves, they should perform inspections in other villages or subgroups, not in their own. ○ There are reasons for separating consultancy and internal inspections, but there are also very good reasons for internal inspectors giving advice to the member farmers. There are many groups, which do not have enough resources for having separate staff for consultancy on the one side, and internal inspections on the other side. An ICS is basically an internal quality management system, and a combination of internal inspections and assistance for improvement, is in line with this approach. Therefore, CERES does not consider it to be a conflict of interest, when the internal inspector gives advice to the farmers, or when the internal report refers to "advice" instead of "non-conformity", etc.
8	Farmer registration and contracting	<p>a. When a group is newly established, or new members join the group, their farm must be properly registered. It is advisable that a separate form is used for this purpose, not the internal inspection report, because this basic information remains the same (as long as no major changes occur on the farm), while the inspection report will be different every year. The whole farm must be registered, including all fields and relevant buildings, and a sketch of plots belonging to the farm. Also, fields with non-certified or conventional crops must be registered, including their management history. It is especially important to register all fields with the crop requested for certification!</p> <p>b. The certifier has a contract with the group, not with the individual farmer. Contracts must be signed between the organization and all members. This contract must cover, as a minimum, the basic applicable rules for organic production, and the farmer's agreement to give access to internal and external inspections.</p>
9	Performance of internal inspections	<p>a. As a minimum, internal inspections must take place once a year. When new groups start, or in high risk situations, CERES may request that more inspections per year take place. In high-risk situations, at least 20% of internal inspections must take place without previous announcement.</p> <p>b. Internal inspections are not just a matter of "filling in forms". Internal inspectors must basically perform the same control procedures as external inspectors, including double-checking of information provided by the operator.</p> <p>c. Depending on the size and complexity of the farms, inspectors should spend sufficient time on a farm unit for inspection. For normal smallholdings with a single crop to be certified, this will be between 1 and 2 hours. For bigger, more complex or high-risk farms, a lot more time must be spent. This means that the group must have a sufficient number of internal inspectors. Big groups must be subdivided in appropriate subgroups.</p> <p>d. Internal inspections must cover the whole operation, including plots in other places, and at least a sample of crops, which are not requested for certification.</p> <p>e. During announced inspections, the farmer or another responsible person must be present.</p> <p>f. An inspection report must be written, containing all relevant information concerning the holding, and outlining non-conformities and corrective actions to be taken. We recommend the use of CERES forms, but own forms can be used, if they contain equivalent information. The report must bear a date and be signed by the producer and by the inspector.</p> <p>g. The internal inspector must carry the previous report during the inspection, to give follow-up to the implementation of corrective actions. The form must provide a specific space for recording such follow-up.</p> <p>h. If there are changes on the farm (new plots, new crops, change in ownership, etc.), the farm registration form and the farm sketch must be updated.</p>

10	Internal approval body	<p>a. The internal approval body can be a group of persons, e.g. the management board of the organisation. Nevertheless, in many situations it may be more functional that only one or two persons are assigned to perform this role.</p> <p>b. The functions of the internal approval bodies are:</p> <ul style="list-style-type: none"> ○ To supervise permanently the internal inspectors. ○ To evaluate the internal inspection forms, keep the grower list updated, and, based on this, work out the organic management plan. ○ The organic management plan must contain a summary of the non-compliances detected during the internal inspections. In case of severe infringements found during the internal inspections, the certification body must be informed immediately. ○ To establish corrective actions and sanctions for the members and give a follow up to their implementation. ○ Pre-approval of the producers' list. ○ Make sure, that excluded or suspended farmers can no longer deliver their products through the group
11	Producer list and map	<p>a. A complete, updated and transparent list of producers is one of the most essential requirements for group certification.</p> <p>b. As a minimum, the list must include the following information for all farmers:</p> <ul style="list-style-type: none"> ○ Complete name ○ Complete address ○ Whole farm area ○ Area of crop(s) to be certified ○ Identification of each field, including its GPS coordinates ○ Crops during previous three years in case of annual crops ○ Planting density / number of plants in case of perennial crops ○ Potential yield ○ Really harvested quantities, at least for the last harvest ○ Dates of the first and the last internal and external inspections ○ Dates of the last use of chemical inputs ○ Certification status. <p>c. Besides, it is recommended that the producers' list is managed as a real database, including complete information on:</p> <ul style="list-style-type: none"> ○ Harvested and delivered quantities throughout the years ○ Dates of all internal and external inspections performed ○ Non-conformities, corrective actions, and their fulfilment. <p>The group should establish privacy rules for access to this database. The information must be available for the certifier, but not necessarily for all group members.</p> <p>d. The internal approval body can suggest the inclusion of new members in the producers' list, but the external certifier must approve the new members, before their products can be purchased as organic. The producers' list approved by the certifier is an essential attachment to the group certificate. Only in the case of very experienced and reliable organisations, the certifier can concede the power of temporary approval of new members to the internal approval body.</p> <p>e. A regional map must be provided, highlighting locations of all farmers (or, in case of big organizations with several subgroups, at least location of these groups), wholesale points, storage rooms, and processing or packing units. Either this map is detailed enough to allow for clear identification of each producer and each field (in most cases, this is not realistic for producer groups), or each producer and his/her fields are identified in the farmer list through GPS coordinates.</p>

12.1	Parallel production	<ul style="list-style-type: none"> a. Parallel production in the stricter sense means that the same crop is planted within the same farm on <u>organic and conventional</u> plots. In producer groups with internal control systems, CERES does not allow this form of parallel production, because we consider the risk of commingling too high. b. Parallel production including fields <u>with organic and transitional</u> status within the same farm is possible, provided a conversion plan exists; and complete separation during and after harvest is ensured and supervised by the organisation. c. <u>Transitional and organic</u> producers can be part of the organisation, if harvest and post-harvest separation is ensured. f. If the organisation includes both <u>organic and conventional</u> producers (the conventional producers not planning to convert to organic in the near future), the organic producers must establish some kind of subgroup, which assures separate post-harvest handling, specific organic consulting, training, and internal control.
12.2	Farmers belonging to different groups	<p>In some regions, it is common for some farmers to belong to more than one certified farmer group. This is perfectly understandable from the farmer's point of view, because depending e.g. on one single exporter, puts them in a very weak position when it comes to negotiating better prices. From the certifier's perspective, this represents a problem, because it becomes more difficult to verify if certain farmers deliver more than they produce on their farms. CERES accepts such setups only, when the other certifiers are willing to co-operate and readily exchange information for the double or triple certified farmers, and the quantities delivered by each of them. If the exchange of information does not work, the respective members will be excluded from the group.</p>
13	Conversion period	<ul style="list-style-type: none"> a. Conversion normally starts with the first documented internal inspection – except for the cases explained in CERES Policy on Organic Conversion Period. b. In the case of producer groups (besides enough proof on non-use of chemicals, sufficient knowledge about organic farming, and good soil management), a consolidated ICS is necessary, if a reduced conversion time is to be considered. c. For considering a reduced conversion period, the ICS must have a well-developed internal procedure for retroactively assessing management prior to the first internal inspection. This may be relatively easy for crops with generalised non-use of chemical farm inputs in the whole region but requires a very competent and professional ICS for crops where some farmers may have been using chemical inputs in the past. Only very few ICS are able to do this properly. d. For crops where use of chemical inputs is quite common in the region, retroactive recognition of conversion period is not possible for producer groups – unless there is very good evidence that the farmers have been subject to monitoring by a credible and very competent external entity during the previous years. Such evidence is valid only if it refers to individual members farms and is based on at least one visit to each member farm per year. A confirmation saying "Farm organisation XY has been regularly trained by us in organic farming from (date) to (date)" is not enough in such cases.
14	Post-harvest handling	<ul style="list-style-type: none"> a. In many cases, the really critical points in farmer groups are not so much related to crop management, but to post-harvest handling. Risks of commingling certified and non-certified products exist on the farms (farmers, who also trade with the respective products), during transport, storage, packing, processing, etc. Farmers are often not even aware of this problem, especially in cases, where no major differences exist between crop management on certified and non-certified farms. b. All post-harvest facilities must be visited by the external inspector. Nevertheless, the organisation is responsible for assuring and supervising correct separation, documentation, and traceability at all these points. In the case

		<p>of very advanced and reliable ICSs, CERES can reduce external control of post-harvest facilities to a sample, which must be determined by the inspector in coordination with the certification officer.</p> <p>c. The organisation is responsible for training all members, explaining them, how important it is, to keep certified and non-certified products separate.</p> <p>d. Approved farmers lists must be available at all wholesale points, where farmers deliver their products, as well as in mobile purchase units. The organisation must establish reliable mechanisms, which allow responsible staff at wholesale points to assess realistic quantities, which can be delivered by each producer.</p> <p>e. From the moment on, where the product leaves the farm, it must be transported in some kind of closed container (e.g. bags or boxes) and labelled. Transports must be accompanied by way-bills.</p> <p>f. Farmers, who trade with the same products, for which they request certification, must be dealt with as traders. They have to keep records on purchased, stored, processed, and sold quantities. Some kind of "invoice", signed by the producer/seller of the product, must be filed. These "trading farmers" must be subject to annual external inspections.</p> <p>d. "Trading farmers" are allowed to handle both certified and non-certified products only in case that they have achieved a high level of professionalism, concerning separation, record keeping, labelling, and traceability.</p>
15	Re-inspection rate	<p>a. The most important criterion for establishing the sample size, is homogeneity of the group, in terms of size of farms, crops grown, cropping system, geographic setup, mixed production, etc. For a highly homogeneous group, even with a small sample we get a representative picture, while for a highly heterogeneous group, we need a much bigger sample for having a representative picture. Therefore, in our formula for calculating the sample size, homogeneity is the factor with the highest weight.</p> <p>b. As suggested by the EU guidance and by the IFOAM guidelines, we use the square root approach for establishing the re-inspection rate: as a minimum, the external certifier must inspect the square root of all members. Besides this, a "risk factor" is used to calculate the re-inspection rate:</p> $n = r * \sqrt{N}$ <p>(N = total number of producers n = minimum number of producers to be inspected by certifier r = risk factor)</p> <p>The minimum number of producers to be re-inspected is 10. In the case of groups with less than 10 members, all must be re-inspected!</p> <p>c. Differing from the above-mentioned guidelines, our risk factors(r) vary not only from 1 to 1.4, but from 1 to 4. Risk assessment is based, among others, on the following criteria:</p> <ul style="list-style-type: none"> ○ Uniformity of the group ○ Performance of the ICS: a good ICS means lower risk, a poor ICS high risk ○ Risk of commingling certified and non-certified products ○ Risk of use of non-allowed substances, especially chemical pesticides and fertilisers ○ Records: a good record system, from the level of the individual producer up to the export level, reduces risks ○ Price difference between organic and conventional products: the bigger the difference, the higher the risk of fraud. <p>Based on these criteria, CERES has developed a special tool for calculating the re-inspection rate. Inspectors must consult with the responsible evaluation officer at CERES to approve the re-inspection for each organisation.</p> <p>d. For producer groups with 5,000 or more members, the risk factor is</p>

adapted as follows:	
Members	Risk Factor
5,000 – 10,000	1.0
10,000 – 25,000	0.9
25,000 – 50,000	0.8
> 50,000	0.6
When the group has less than 5,000 members, but because of the risk analysis the sample would be bigger than $\sqrt{5000}$, then a sample of $\sqrt{5000}$ is used.	
<p>e. Even more important than the total sample size, is representativity of the sample, in terms of e.g.:</p> <ul style="list-style-type: none"> i. Normally, the sample should cover at least three farmers per internal inspector. Exceptions to this rule can be made only for very large groups with more than 10 internal inspectors. In such cases, attention needs to be paid to rotating the sample in a way that each internal inspector is covered at least within a 3 years cycle. ii. Geography: the sample must be more or less evenly spread over the whole area where farmer population is located. iii. Distance to urban centres: risk of using chemical farm inputs is often higher close to urban centres, while risk of not undergoing internal inspections may increase in more distant areas. iv. Farm size: the sample should be representative of the different farm sizes which are present in the group, giving some priority to larger farms. v. Topography: farms on flat land and on slopes should be included, to assess erosion risk and effectiveness of soil conservation measures. vi. Water bodies: if existing, farms which are crossed by water bodies or adjacent to the same should be included in the sample, to verify potential pollution of water by farm activities, protection of riverbanks, and buffer zones. vii. Crops: if several crops are requested for certification, then of course, as a minimum, each crop must be included in the sample. Even if only one crop is requested for certification, some farmers may be growing other conventional crops, while others don't. It is important in such situations to include a sufficient number of farmers with "mixed/split production" in the sample. <p>f. Evaluation of performance of internal inspectors is not only an issue of quantities, but even more of quality. To get a real insight in the work of internal inspectors, it is not enough to evaluate their reports. Therefore, CERES will always perform witness audits of internal inspector performance during external inspections.</p> <p>g. In case of follow-up inspections, CERES suggests including in the sample a 20% of farmers, who had been visited by external inspection previously, while 80% will be "new" farmers.</p> <p>h. The NOSB recommendation determines, that the sample of farmers to be re-inspected must include:</p> <ul style="list-style-type: none"> i. All members considered as being of "high risk" (criteria for high risk see above) ii. Among the remaining members (not among the high risk group) making up the sample, 25% should be selected at random. <p>i. In the case of high risk crops, on which use of agrochemicals is widespread in the respective region, CERES will decide on a case-to-case basis, if 100% of farmers need to be inspected, or a sample-based approach can be used. Inspections must be planned in close coordination with the responsible evaluation officer in such cases.</p>	

16.1	Steps to certification	Please see the CERES document "Steps to organic certification for producer groups"
16.2	CERES' role in preparation of ICS	To avoid conflicts of interest, ISO/IEC 17065 does not allow certifiers getting involved in consultancy. Therefore, CERES is not allowed to get involved in setting up ICS for groups. This must be done by independent consultants. CERES can offer public trainings open to ICS representatives and internal inspectors from different organisations.
16.3	Group inspections in India under NOP	<p>Specific requirements India (currently only referring to NOP certification in India, as Ceres is not listed for India under the EU reg.): In the case of high risk groups the usual measures of conducting at least one additional unannounced inspection and testing have to be performed; special focus has to be put on verifying consistency of farmer list and producing farmers in reality (to identify "ghost farmers")</p> <ul style="list-style-type: none"> i. groups certified under NPOP (National Programme Organic Production in India) have a maximum size of 500 famers, meaning that for example a group of 1900 farmers could apply for NOP certification, but would have four APEDA issued certificates. CERES will accept application as one group, but closely review and cross check on consistency of the given information. Beside the general requirements (i.e. final approval of grower group members only by CERES, ...) it must be verified the group has established and implemented an ICS and is working under a single organic management plan (OMP). ii. Under NPOP separate certificates are issued for crop (group), handling and trade, in case one legal entity is involved only one certificate is issued under NOP and only one entry is made in the oid. Special attention must be put to clarifying the structure and including all involved entities. iii. Under NPOP the only threshold for farmers that all need to be inspected externally is being bigger than 4 ha; CERES Policy is differentiating according to cultivated crop <u>and</u> size (see #5.2 of this policy).
17	Certification, corrective actions, and sanctions	<p>Group certification means that the organisation is treated as one entity. The group must be aware that this may lead to situations where infringements by one or few producers are punished by sanctions or decertification affecting the entire group. This is especially true when products from different growers are mixed, making it impossible to separate the product proceeding from the growers who do not comply with the standards.</p> <p>Conditions which must be fulfilled before the first group certificate is issued:</p> <ul style="list-style-type: none"> a. Internal inspectors have adequate knowledge b. 100% of internal inspections have been performed, documented and evaluated. c. The producers' list with complete and reliable information (see 5.7) is presented d. All producers have received at least some basic training in organic farming e. Reliable information on last use of chemical inputs is available for all producers, and allows to assign a status (conventional, transition, organic) to each of them f. The organisation has established a system, which avoids post-harvest commingling with non-certified products. <p>In case that different group members have a different organic status, the group must also establish a system, which assures separate purchase and post-harvest handling of these products. If this is not possible, the whole group is assigned the lowest status (e.g. 1st year of transition, even though some members would already qualify for organic).</p> <p>Besides the normal catalogue of remediation measures and sanctions, typical</p>

		<p>group measures include:</p> <ul style="list-style-type: none"> g. Exclusion of members who do not comply with essential rules. h. Increase of the re-inspection rate. i. Obligation to improve training and/or supervision of producers and/or internal inspectors. <p>In case that CERES detects during the external inspection severe infringements, which had not been detected or adequately sanctioned by the ICS, there are the following options:</p> <ul style="list-style-type: none"> j. If it is obvious that the problem is related to deficiencies in the ICS, then the whole group will be suspended from certification, until remediation of the problems is confirmed by a new external inspection. k. If it is very obviously an individual, isolated case, while the ICS in general performs well, then only the individual group member must be excluded or suspended. l. If it is not clear whether the problem is isolated or systemic, then the re-inspection rate and sample size can be increased. This normally involves additional costs. If the result of the additional inspection or increased sample size confirms deficiencies in the ICS, the conclusion will be the same as in (a).
18	Recordkeeping by farmers	<ul style="list-style-type: none"> a. Many members in producer groups are illiterate, "functionally illiterate", or simply do not have a habit of keeping records of what they do on the farm. In simple growing systems (with one certified crop and all the member farmers doing more or less the same activities at the same time of the year), we therefore accept that group members do not keep farm diaries. b. The main records are kept by the ICS: farm registration, contract, internal inspection report, delivered quantities, follow-up on non-conformities. c. Farmers are expected, however, to keep at least copies of receipts that they get when delivering products. This allows to cross check the records kept at the group level. d. With increasing size, complexity and risk level of member farms, also recordkeeping requirements must be increased. E.g. quinoa or vegetable farmers or raspberry farms should keep farm diaries – except for situations where the ICS is frequently present on the farms to supervise farm activities (beyond the annual internal inspections) and can therefore keep farm diaries on behalf of the farmers. Diaries kept by office staff that is not really in contact with the farms, are not accepted as a substitute.
19	Related documents	<ul style="list-style-type: none"> • 3.1.1.2 Steps to organic certification for producer groups (Inf) • 3.2.5 Brief information on group certification (Inf) • 3.2.36 Brief information on subcontracting (Inf) • 4.1.3.1 Policy for group certification with 100% external control (Pol) • 4.2.3.0 Which reporting format (WI) • 4.2.3.5 Producer group inspections (WI) • 4.3.5 Organic management plan for producer groups (F) • 4.3.5.1 Internal inspection report (model) (F) • 4.3.5.2 Example farmer list (F) • 4.3.5.3 Internal farm registration (F) • 4.3.5.4 Farm structure assessment (F) • 4.4.5 Standard inspection program producer groups (Inf) • 4.5.5 Short Inspection Report (T) • 4.5.5.2 Spreadsheet for risk factor assessment (T)