

**Groups of operators (ICS)**

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The certification procedure for organic production is regulated by the norms for the respective standard.

**For EU-certification in Third Countries:** Reg. EU 2018/848 + delegated and implementing acts

**For the USA:** the NOP Final Rule

**For Japan:** the organic JAS

For the certification of groups of operators, specifically, the following rules will be considered by Kiwa BCS, in line with the above-mentioned norms:

**For EU-certification in Third Countries:**

- Reg. (EU) 2018/848, Art. 36; Reg. (EU) 2021/279 Art. 4, 5, 6, 7, 10; Reg. (EU) 2021/771 Art. 2; Reg. (EU) 2021/1698 Art. 9, 10

**For the US:**

- NOP Policy memo 10-11,
- NOSB Recommendation, Adopted October 20, 2002, Criteria for Certification of Grower Groups,
- Certifying Operations with Multiple Production Units, Sites, and Facilities under the National Organic Program, November 19, 2008

**For Japan:**

- IFOAM Smallholder Group Certification - Compilation of results – March 2003
- IFOAM Norms for organic Production and Processing (8.3 – Group Certification)– Version 2012
- IFOAM Smallholder Group Certification - Guidance Manual for Producer Organizations – May 2004

⇒ Please note: This inspection program for groups of operators applies in conjunction with the inspection programs according to the certified scopes, such as agricultural production, beekeeping etc.

The inspection program is structured as follows:

- a) Organic Systems Plan
- b) Inspection
- c) Certification

**1. Organic Systems Plan**

The Organic Systems Plan must be compiled and submitted to Kiwa BCS Öko-Garantie for verification before inspection. The Organic Systems Plan must be updated continuously to reflect the current state of the operation. Changes always must be communicated to the certification body, but no later than before the next inspection.

An Organic Systems Plan template is provided by Kiwa BCS. It consists of the following elements:

- Conformity Declaration of the Operation Manager for the respective standard
- Complete description of the operation and its facilities
- Description of all production procedures and –means, so Kiwa BCS can verify their compliance with the respective standard
- The OSP ICS
- The farmers list
- Further annexes as listed in the OSP ICS

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In case the operator is interested in being certified under Reg. (EU) 2018/848, it is mandatory to provide a preventive measure plan mentioned in Reg. (EU) 2021/1698 Art. 10, 1. a) iii.

On the other side, under NOP a Fraud Prevention Plan is mandatory to be provided in this stage.

**2. Inspection of Agricultural Operations**

During inspection the compliance of the operation/part of the operation with the requirements of the respective standard is verified. An announced inspection takes place at least once per year. Further announced and/or unannounced inspections can be part of the certification procedure. The inspector is obliged and authorized to request and verify all documents, records and information as deemed necessary for the inspection.

**2.1. Organic Systems Plan**

In general, the inspection is based on the verification of statements in the Organic Systems Plan, including its annexes, and on a comparison with the findings in the facility. If needed, adjustments must be made to the Organic Systems Plan.

**2.2. On-Site Inspection**

The inspection visit aims to the evaluation and assessment of the set-up and functioning of the internal control system, of its effective application and to the compliance with the standards.

The on-site inspection by Kiwa BCS (so called “external inspection” or “re-inspection”) will include on-site inspections at the premises of operators who are members of the group. The external re-inspection of a sample of group members must be undertaken to evaluate the effectiveness of the internal control system

The minimum number of operators to be inspected by external inspectors depends on the quality and efficacy of the ICS. In any case, the number of farmers subject to annual external inspection shall not be lower than 10.

For EU certification, a minimum of 5 % of the operators will be subject to re-inspection every year.

According to the NOP a minimum of 2% of members or the square root of the total number of members multiply by 1.4 whichever is bigger must be inspected.

The on-site inspection at the individual operator’s farm will be carried out in line with the inspection program for the applicable scopes, such as agricultural production or beekeeping. The group members selected for external inspection must be present during the on-site inspection of their premises.

In addition, the Kiwa BCS inspector will visit and assess premises and activities that are centrally managed by the group.

During the inspection by Kiwa BCS, the Kiwa BCS inspectors must audit internal inspectors; in case of groups with several internal inspectors, the external inspector will audit at least one internal inspector.

The Kiwa BCS inspector will also verify whether new members, new production units or new activities have been accepted only after approval by the ICS manager based on the internal inspection report and according to the procedures of the group.

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Moreover, the Kiwa BCS inspector will assess whether the ICS manager fulfils all defined tasks.

**2.3. Verification of Documents**

In addition to the OSP including annexes, the following documents must be made available to the Kiwa BCS inspector by the ICS manager:

- written and signed membership agreement between each member and the group
- internal inspection reports
- training records of the ICS inspectors
- training records of members of the group of operators
- the records of the measures taken in case of non-compliance by the ICS manager
- traceability records
- sketch maps of each farm including production, processing, and storage

Additionally, farmers must have their own farm management records available.

**2.4. Inspection Report**

- The inspection report is the final document that describes the results of the inspection. It is compiled by the Kiwa BCS inspector and must be signed by the operation manager.
- It documents detected areas of concern / non-compliances with the respective standard.

The results of the inspection report are basis for the certification.

**2.5. Possible other Procedures**

- Sampling is always possible, but in moments of suspicion it is mandatory. Note that sampling will be mandatory for EU compliant certification of groups of operators (refer to reg. 2021/279 art. 7 (d))
- Sampling of packaging and/or labeling materials
- Inspection of additional parts of the operation
- Additional inspections

**3. Certification**

- Certification is based on the inspection report and the Organic Systems Plan
- If needed, conditions are imposed and communicated in written form
- If needed, notification is given with measures according to the catalogue of measures
- Tracing of implementation of conditions by Kiwa BCS
- Certification decision / issuance of certificate

The Inspection Program is a model and not conclusive. Specific situations in the operations can lead to variances from the described program. It serves for orientation during the execution of the certification procedure according to the respective standard by Kiwa BCS Öko-Garantie GmbH. The Inspection Program is subject to modifications.