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| **Instructions for Completion** |
| * This document is to be completed in conjunction with the relevant ACO Organic Integrity Plans. * All sections of this document require completion. Any sections which are not relevant should be identified as such. |

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| **Business Name:** |  |
| **Trading As:** |  |
| **Physical Address(es):** |  |

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| **Question** | **Answer ICS Manager**  *Operator to complete* | **Related Template**  *Operator to complete* | **Guidance** |
| Is the group a legal personality? Describe and attach evidence |  |  | The certified legal personality shall be the group as a whole and must agree to be legally bound by written contract with ACO. |
| Describe the process for accepting new members into the group? |  |  |  |
| Does marketing/sale of the certified organic product only occur through Growers Group and not independently by individual growers for approved commodities? |  |  | Individual members cannot sell their certified products as organic outside of the group’s point of sale as organic. Certified sales can only go through the ICS. The following evidence (was/was not) verified at audit:   * 1. Discussions with growers;   2. Discussions with field officers.   AND / OR  Please explain why this question was not inspected.  AND / OR  Please explain why this question was not relevant. |
| Is the groups management and system available in English? |  |  |  |
| Are all members Farmers? If not, provide details on non-farmer members. |  |  |  |
| Are all members eligible to be members? Refer to Grower Group Data Form as evidence. |  |  | Exporters/processors cannot hold the certificate of group of operators.  Eligible members are   1. Farmers of which the individual certification cost represents more than 2% of their annual turnover or standard output of organic production and whose annual turnover of organic production is not more than 25.000 EUR or whose standard output of organic production is not more than 15.000 EUR per year; or 2. Farmers who have each holdings of maximum: 3. five hectares 4. 0,5 hectares, in case of greenhouses, or 5. 15 hectares, exclusively in the case of permanent grassland. 6. 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.   Note that managed and owned land not certified must also be considered for member compliance. |
| Does the group have max 2000 members? |  |  | Active and passive – to ensure management capacity   1. Above 2000 members, new legal personalities must be formed, and separate certification applies (for EU group certification only). |
| Define the geographical proximity criteria or radius of the group’s members and any production units. |  |  | All members are required to be in the same defined geographic proximity of one another. |
| Is the Grower Group Data Form current and completed? Please attach. |  | 206-02 Grower Group Data Form | Minimum of information to be kept   * Names of all group members * All production units including address and contact person * Identification numbers for each grower * Date when each grower/unit joined group (start of conversion period) * Hectares certified * Certification status per plot/area (In conversion, Organic, Suspended) * Non-registered (non-certified) plots including hectares owned by grower/family * Crops produced/processed * Yield (potential) * Harvest/collection * Sale * Date of Internal inspection * Name of Internal inspector * Compliance result of last internal inspection * Date of External inspection * Compliance result of last external inspection compliance * Risk based additional inspection needed |
| Do all members practise similar farming systems and operate under the group's approved management / Integrity plans and ICS procedures? Attach completed plans and submit a comprehensive Input Register for all inputs used by the group managed through by ICS. |  | ACO Organic Integrity Plans  OIP Crops / OIP Wild Harvest / OIP Handling | Comprehensive Organic Integrity Plans must be completed by Group and maintained on an ongoing basis, including INPUT REGISTER. Do these procedures, practises and inputs comply with all relevant standards? |
| Do all members operate on common input regime, and if so, how are inputs approved? |  | 205-107 Input register | Identify the need for inputs (seeds, fertilisers, tools, etc.) and approval process for supply to individual growers, subgroups, or entire groups. |
| Have prohibited inputs been used by group members?  If yes, how, and what sanctions have been applied? |  |  |  |
| Are all production units (including non-farm units) listed in the Grower Group Data Form and are they annually inspected by the ICS? |  |  | 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 group’s management system  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.  1.10 Production units must be inspected internally and externally |
| Does the group have an Organisational chart defining sufficient staff, their roles, and responsibilities? Attach the chart and list of ICS staff. |  |  |  |
| Does the ICS manage and maintain Conflict of Interest of ICS staff on an ongoing basis? |  |  | The following evidence (was/was not) verified at audit:   * Signed annual declarations by all Field Officers regarding any conflicts of interest in their role.   AND / OR  Please explain why this question was not inspected.  AND / OR  Please explain why this question was not relevant. |
| Does the ICS staff have sufficient capacity and competency to ensure compliance for the entire group? Are there any competency gaps? |  |  | See Section 4 in ACO GROWER Group Information including table.  4.1 The group must have an organisational chart defining sufficient staff and their roles and responsibilities.  4.2 All staff must show competencies for the tasks and responsibilities  4.3 All ICS staff must participate in ongoing training for ICS and standard requirements |
| Are all ICS staff appropriately following ICS protocols (raising NCs, report writing etc) |  |  | See Section 4 in ACO GROWER Group Information including table  4.4 ICS shall develop a performance review for each ICS staff member including witness audits and training or inspectors  a. A contract specifying employment parameters including a clause that defines staff member rights and responsibilities in reporting noncompliance. |
| When was the ICS last reviewed to ensure the procedures are current? Including checking the requirements identified at section 5.1 of the ACO Grower Group Norms. |  | 206-04 ACO Grower Group Norms. | See Section 5.1 in ACO Grower Group Norms  The ICS Manual includes procedures and document of all certified and uncertified activities of the group. It defines the record system and compliance procedures of all members, production unit. All procedures and documents must be kept up to date and resubmitted to ACO for risk assessment prior to annual audit. |
| Does the ICS provide (at least) annual training and performance review for ICS staff and also members? Does this align to the documented training policy?  Submit up to date Training register including (Training content, Trainer, date, signature) |  |  | Regular and ongoing training and competency building of staff and grower including position specific competency development and training |
| Did the ICS conduct 100% internal inspections of all members and production units?  Have all inspections been recorded in the Grower Group Data Form? |  | 206-04 ACO Grower group norms Annex IV – Internal inspection checklist Template and 206-02 Grower Group Data Form | Managing annual internal and follow-up inspections for all group members, as well as new entry inspection procedure which documents how decisions are made, particularly in relation to evaluating the group’s compliance to the Standard and setting noncompliance. Additionally, it should define the management and recording of noncompliance and resulting sanctions, including a procedure for ensuring that the Certification 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   * Internal inspectors must comply to the ICS staff requirements and must have the competency in auditing. Agricultural knowledge and group systems * 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 * Internal inspector shall identify and inspect grower and production unit specific critical control points * Internal inspections must document all non-compliances and verification of corrective actions. * 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. * 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. |
| Are Internal audits and training conducted at separate times by ICS staff? |  |  |  |
| Does the ICS follow a noncompliance and sanction policy, including sanctions of noncompliant growers or ICS staff or removal of product from the supply chain? Have sanctions and non-compliances been recorded in noncompliance register and communicated to the ICS manager and ACO? |  |  | The following evidence (was/was not) verified at audit:   * Grower non-compliances are adequately recorded; * Action taken by Growers is adequately recorded and within agreed timeframes; * The decision to close a nonconformance is based on evidence that the corrective action has been effectively implemented made by suitably trained representative of the ICS Management / Field Officers other than the Field Officer who raised the non-conformance.   The following evidence (was/was not) verified at audit:   * The process outlined in the ICS manual was followed to remove a non-compliant Grower from the Group; * Records kept (e.g. updated Land Management Form).   AND / OR  Please explain why this question was not inspected.  AND / OR  Please explain why this question was not relevant. |
| Are all relevant ICS staff documents maintained on an ongoing basis and compliant? |  |  | * Conflict of Interest forms * Confidentiality agreement * Contracts * Competency profiles of internal inspectors and staff |
| Are all relevant member documents compliant and maintained? Such as Grower contracts, specific maps, and an overview map. |  |  |  |
| Does the documentation system permit a full mass balance within the group and product traceability from sales through to each group member? Describe the list of documents used to enable this balance and trace to occur. |  |  |  |
| Does the Internal Inspection Report/Checklist capture the requirements of the ICS and organic regulations/standards? |  | ACO GG Norms 206-04 ACO Grower group norms Annex IV – Internal inspection checklist Template | Internal Checklist must be used for ICS Internal audits and member audits. See ACO template for Internal member audit checklists. |
| Have control measures been implemented on non-compliances raised at the last external audit? Have ICS staff and members been trained on the last external audit outcome? |  |  | * Annual external inspections of the entire grower group supply chain must verify: * The group’s organic management system plan * ICS implementation and compliance * ICS effectiveness to protect organic product integrity * Prior annual external inspection: * The ICS must submit current Integrity Plans and updated grower group data base for document review and risk assessment * Risk assessment will be assessed on square root, risk assessment and no less than 5% of growers to be inspected * External inspection course * Opening interview * ICS Inspection including implementation of all procedures and documentations * ICS 100% annual internal inspections verification * Risk based selection of externally to be inspected growers * Witness audit(s) of an internal inspection(s) * Exit interview |

**Signature**

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| **Name:** |  | **Position:** |  |
| **Signature:** |  | **Date:** |  |