

Grower Group Audit & Certification

Grower Groups are organized groups of farmers /producers who intend to produce organic products by the organic processes as per the – NPOP Standard.

Grower group will be based on the Internal Control System (ICS) and will apply to grower groups, farmers' cooperatives, and structured group of producers affiliated to a processor. To avail of this service, under the -NPOP -has to be followed

- 1- The Grower Group should be a registered legal entity in the form of, a. Society registered under the Societies Registration Act, 1860 or relevant State Societies Act / Rules, Farmers Producer Organization (FPO)/Farmers Producer Company (FPC) incorporated under the Companies Act, 2013, as amended from time to time, c. Co-operative society.
- 2- The producers in the Grower Group must apply similar production systems.
- 3- Land or unit, as applicable, of each member of the Grower Group shall be in geographical proximity and preferably in the same village or adjacent villages of the same district / border districts within a radius of maximum 50 Km.
- 4- Grower Group shall market its products as a single entity.
- 5- A Grower Group shall consist of a minimum 25 and maximum of 500 farmers.

Prerequisite for farmers registered in the Grower Group under NPOP:

- 1- The farmers interested in organic farming shall register themselves with the Ministry of Agriculture & Farmers Welfare (MoA&FW) through its centralized portal.
- 2- Upon farmer registration, a unique ID shall be generated.
- 3- The farmers shall provide the unique ID to the ICS of the Grower Group for registration under NPOP.
- 4- During registration under NPOP through the unique ID, the farmer information shall be validated from the centralized portal and farmers database of MoA&FW and transferred electronically to NPOP database through an Application Based Interface (API)
- 5- Upon successful verification and transfer of farmer information to the “Trace net”, the subsequent process for registration of the Grower Group shall be carried out.

ICS Control System:

- a. The ICS of the Grower Group shall have an office at the location or in proximity of the Grower Group.
- b. ICS shall be established for functioning of the Grower Group and shall be responsible for compliance with the requirements under the NPOP.
- c. The ICS of the Grower Group shall have a defined organizational structure, with an organizational chart, with defined roles and responsibilities for the personnel of the ICS.

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- d. The Grower Group may identify qualified and experienced personnel for functioning and maintenance of the ICS. It shall verify the credential of the personnel including previous employment.
- e. The ICS shall formulate internal standards in local language under the framework of NPOP.
- f. The ICS shall have adequate internal inspectors for ensuring that 100% inspection of all farmers in the Grower Group is carried out twice a year.
- g. There shall be at least one internal inspector per 50-60 farmers.
- h. The inspectors shall be well versed with the standards to perform internal inspections.
- i. All the farmers shall maintain the farm diary for noting their activities on their farms.
- j. The farm diaries should be available for inspection with the respective farmers.
- k. The ICS shall also be responsible for organizing required training to the farmers in production and Grower Group certification requirements.
- l. Details of farmers, including name of the Farmer, Father's / Husband's name, the geo-location of the farm, its area, crops grown in the farm, Farmer's unique ID as given by the Ministry of Agriculture & Farmers Welfare, who are the members of Grower Group shall be displayed at the ICS office of the Grower Group.
- m. A manual for the ICS shall be formulated by the Grower Group comprising policy and procedure for functioning of the ICS and the Grower Group including procedures for inclusion of members in the group and exit from the group, agreement of the members with the ICS.
- n. The ICS Manager shall be responsible for compliance of the Grower Group with the requirements under NPOP. Such ICS Manager shall be the contact person for the ICS and shall be resident from within the geographical limits of the Grower Group.
- o. In case the farmers are unable to run and operate its ICS, such farmers may enter into a contract with an external service provider to act as the ICS. Such service provider shall perform all duties and responsibility of the ICS under the NPOP and all provisions applicable to an ICS under the NPOP, including sanctions, shall mutatis mutandis apply to such external service provider.
- p. The ICS shall have procedure and terms of reference for engagement of an external service provider (if any) with defined roles and responsibilities.
- q. The service provider so contracted will facilitate the maintenance of the internal control system, training, co-ordination and marketing of certified produce and certification from a Eurofins Assurance India Private Limited. The service provider will also ensure that all requisite documents are maintained at the ICS office.

The internal control system will contain appropriate records as follows

- Production description, production and / or preparation specifications for products to which the application applies

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- Maps, description of the farms and the facilities of all members
- List of inputs (ingredients and agricultural substances)
- A copy of organic production and/or preparation plans.
- Traceability records, including information on the quantities, on the following activities, where relevant:
 - a) Purchase and distribution of farm inputs including plant reproductive material by the group.
 - b) Production including harvest.
 - c) Storing
 - d) Preparation
 - e) Delivery of products from each member to the joint marketing system.
 - f) Placing on the market of products by the grower group.

The internal control system will have a mechanism to remove non-compliant group members from the list. Corrective actions required by the Eurofins Assurance India Private limited during the previous certification cycle, as well as any corrective measures implemented by members concerning these requests.

- A complete list of registered group members.
- Continuous verification of implementation of the internal inspections.
- Summary of the internal inspection reports including the date of the last internal inspection with the name of the ICS inspector.
- The training of members of the group on the ICS procedures and the requirements of NPOP.
- The approval of new members in an existing group or, where appropriate, the approval of new production units or new activities of existing members upon the approval by the ICS manager on the basis of the internal inspection report

The internal control system will record all nonconformities. The ICS will require from the member to respond to the NC report issued by the ICS within 30 working days of its receipt. The response will either provide evidence of completion of corrective action taken to address each NC or present a plan with milestones as to how each NC will be addressed. This plan will include a completion date not exceeding 60 working days from receipt of the NCs. The ICS will accept times greater than those stated for the closure of a NC as long as they are justified and documented.

Eurofins Assurance India Private Limited will evaluate by checking the ICS, staff qualifications and auditing the farms on the basis of the risk assessment. The internal control system will contain appropriate records including:

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- a) Farmer application, agreement with the ICS and land records.
- b) Farm maps, crop maps, and overview map (Village or community map) with the description of the farms and the facilities of all members.
- c) production description, production and/or preparation specifications for products to which the application applies.
- d) List of inputs (ingredients and agricultural substances).
- e) A copy of organic management production and/or preparation plans
- f) A complete list of group members (Approved farmer list) .
- g) Continuous verification of the implementation of the internal inspections and approval committee.
- h) summary of the internal inspection report

Initial certification

- Eurofins Assurance India Private Limited will evaluate the effectiveness of the internal control system to assess the compliance of all members with the NPOP requirements.
- The certification inspection of the grower group by the Eurofins Assurance India Private Limited will include an assessment of the risks to organic integrity within the grower group and the geographical location in which it functions. A sample of all sites under the grower group's responsibility will be subject to inspection visits by the Eurofins Assurance India Private Limited to assess the effectiveness of the ICS.
- The Eurofins Assurance India Private Limited may justify exceptions to this rule based on risk assessment.
- The percentage of number of group members subject to the initial certification inspection will be based on the results of a risk assessment and the following calculations: Factors to define the risk as normal, medium, and high will include:
 - Factors related to the magnitude of the grower group
 - Organisation size and sites' size
 - Value of the products
 - Numbers of years the grower group has functioned
 - Number of new members registered yearly
 - volume and value of the production
 - The type of non-compliances
 - Staff turnover
 - The management structure of the internal control system
 - Factors related to the characteristics of the organization.
 - Variations in the product systems
 - Risks for intermingling and/or contamination

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- Geographical dispersion of the sites
- Degree of uniformity among the production units, sites or facilities

The sample size shall be determined as below:

- a. High risk: 2 X square root of number of farmers
- b. Medium risk: 1.5 X square root of number of farmers
- c. Low risk: square root of number of farmers (min 20 farmers)
- d. A min of 20 farmers shall be inspected during external inspections.

The sampling plan should be such that all the farmers are covered in the external inspection in due course and the same farmer is not repeated except in case of verification / suspicious of noncompliance is there.

- Eurofins Assurance India Private Limited will assign auditors who have appropriate training on inspection of internal control systems.

Maintenance of certification

- Each year the Eurofins Assurance India Private Limited will define and justify a risk-based sample of members subject to annual inspection to assess the effectiveness of the ICS. The minimum number of members subject to annual Eurofins Assurance India Private Limited inspection shall be square root of the total number of members multiplied by 1.5.
- In cases of high risk members the Eurofins Assurance India Private Limited may increase the number of group members subject to annual inspection to at least 2 times the square root of the number of the members in the grower group (for example, ICS has issued a lot of internal sanctions, or a lot of new members).
- The members visited by the Eurofins Assurance India Private Limited will be predominantly different from 1 year to another. In addition to the risk factors defined as above, the Eurofins Assurance India Private Limited,s may consider the following selection criteria when selecting the sites being subject to visits:
 - ✓ results from internal control system inspection
 - ✓ complaint files
 - ✓ significant variations of the sites' size
 - ✓ modifications since the last certification
- The Eurofins Assurance India Private Limited will ensure that the grower group maintains an updated list of all members and informs the Eurofins Assurance India Private Limited in a timely manner anytime there are changes to the status of the members and changes to the group as a whole.
- The Eurofins Assurance India Private Limited will ensure that the grower group has established procedures for adding new members to the grower group.

Records

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- The Eurofins Assurance India Private Limited will ensure that the grower group has record-keeping protocols for the individual production units, sites, or facilities within a grower group.
- The Eurofins Assurance India Private Limited will maintain records of sample inspection to ensure that over time, the inspections are representative of the grower group as a whole and take into account any previously identified risk.

Certification documents

- The Eurofins Assurance India Private Limited will provide certification documents to the grower group as a whole. Members within a grower group that have had its operations or product certified cannot possess individual certificates unless that member has obtained its own certification independent from the grower group for a different product.

A- Certification Application:

The first step for getting NPOP certification for the scope of crop production- individual farmer, crop production – grower group, wild collection, input attestation, processing & trading from Eurofins Assurance India Private Limited operator need to contact with Eurofins Assurance India Private Limited office by mail and phone calls at office. As per the request Eurofins Assurance India Private Limited sends a service request form to the operator, after the review of the service request form Eurofins Assurance India Private Limited sent the quotation to the operator and after the acceptance of the quotation operator share the application package, application form, organic system plan, e copy of updated NPOP standard etc. Operator need to filled the application packet as per the scope applied for to the Eurofins Assurance India Private Limited.

B- Application review procedure:

After receiving the filled-in service request form, Eurofins Assurance India Private Limited office give the quotation to the operator and after acceptance of the quotation Eurofins Assurance India Private Limited sent the application form, OSP, and all the associated documents, Eurofins Assurance India Private Limited reviews the documents i.e. Application, OSP, etc. If any clarification is needed then Eurofins Assurance India Private Limited reverts back to the operator for the correction. On receiving the updated application, OSP, etc. from the operator It is reviewed by the Eurofins Assurance India Private Limited. Eurofins Assurance India Private Limited conforms to the operator for the reviewed application and OMP. -

C- Certification Agreement with Eurofins Assurance India Private Limited:

Eurofins Assurance India Private Limited sent certification agreement to the operator. The operator sends back a signed certification agreement to Eurofins Assurance India Private Limited.

D- Audit Process:

Eurofins Assurance India Private Limited in agreed with the operator, fixes the date and time for audit. Eurofins Assurance India Private Limited staff will deputed an auditor / audit team

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accordingly. The operator has to co-operate with the auditor / audit team as declared in the certification agreement. The audit process is as follows.

- **Opening Meeting :**

Upon arrival at the Operator's site-auditor shall chair the opening meeting. In the opening meeting, Auditor will demonstrate the audit process as per the Audit Plan share with the operator before the Audit.

- **Collecting and verifying information**

During the audit, the auditor shall collect and record objective evidence to demonstrate that the operator's system is both implemented and effective. Information relevant to the audit objectives, scope, and criteria (including information relating to interfaces between functions, activities, and processes) shall be collected by appropriate sampling and verified to become audit evidence. Such evidence shall be obtained from interviews, review of documentation and records, observation of processes and activities and conditions in the processes audited. Records shall identify personnel interviewed.

Eurofins Assurance India Private Limited shall ensure that during the Initial / Renewal / Annual Surveillance audit etc, the auditor verifies on-site that previously submitted corrective actions have been, and remain, fully implemented, auditor is also verified that any changes in organic standards and Eurofins Assurance India Private Limited requirements have been effectively implemented by the operators.

- **Preparing the Finding Report**

The finding report shall be prepared and issued by Auditors during the closing meeting.

- 1. Audit Plan – As executed**

As deemed necessary, as auditor amend the original version of the audit plan to reflect the real timing and sequence of the audit events

- 2. Nonconformities**

There are three types of observations – Major , Minor non-conformity and opportunity of improvement shall be substantiated by objective evidence or absence of objective evidence such as witnessed, recordable, verifiable, and quantitative collection of facts. Auditor, shall review the findings and record them.

- a. Major nonconformity:** Failure to fulfil one or more requirements of the management system raises doubt about the capability of the management system to achieve the expected outcomes or to effectively control the process for which it was intended.

- b. Minor nonconformity:** Failure which does not impact the capability

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of the management system to achieve the expected outcomes. A minor nonconformity usually does not represent a material risk to product quality, human health, and safety, or impact on the environment, and does not raise doubt about the capability of the management system to achieve its policy and objectives. A number of minor nonconformities associated with the same requirement or issue could demonstrate a systematic failure and thus constitute major nonconformity.

- c. **Opportunities for Improvement (OFI):** An opportunity to enhance the existing work process / practice / method that conforms to the requirement of the audit criteria and / or of the organization, but may not represent the current state-of-the-art approach, or best practice, but may represent a potential for a nonconformity.

3. Timelines for submission of corrective action plans & implementation of corrective actions

- a. **Corrective Action Plans:** All corrective action plans, including evidence of correction, shall be submitted within 30 calendar days from the last day of the activity unless the client's certificate expires prior to that date; in such case, the corrective action plan shall be submitted prior to the certificate expiring.
- b. **Major nonconformities:** For major nonconformities, all corrective actions shall be implemented (including verification of effectiveness) within 30 calendar days from the last day of the activity unless the client's certificate expires prior.
- c. **Minor Nonconformities:** For minor nonconformities, all corrective actions shall be implemented (including verification of effectiveness) within 60 calendar days from the last day of the activity. Effective implementation of corrections and corrective actions will take place at the next visit.

- 4- **Closing Meeting:** The auditor shall summarize the finding in front of the operator and provide a copy of the findings to the operator and seal and signed.

- **Certification:** The Reviewer will review the Audit report and the file will be submitted to the certification committee. If additional documents are required, a communication will be sent to the operator.
- **Certification decision:** The certification committee of the Eurofins Assurance India Private Limited shall take a decision on the basis of the evaluator's recommendation, and corrective action against the raised noncompliance, available test reports, and operator file review. The certification decision will communicate to the operator and generate the scope certificate. At the farm unit, the NPOP standard shall be applied for at least twelve months before the first harvest of organic products. The prohibited substance shall not have been used for at least 36 months before the harvest of an organic crop. The client needs to complete the transition period of its farm unit.
- **Label approval :** The operator shall make the label incorporating the logo and other relevant details and shall send to Eurofins Assurance India Private Limited for approval. Eurofins Assurance India Private Limited approves the label as per standards and sends the approval decision to the operator. Operator may use the label for marketing only after the label approval obtained from Eurofins Assurance India Private Limited.
- **Appeals:** If the operator does not accept the certification decision, he /she can request for reconsideration of the decision in writing. Then the file will be submitted to the certification committee for re-consideration. If the operator still does not agree with the revised decision, he /she can appeal to the appeals committee . The file will then be submitted to the appeals committee, which takes final decision on the case. In case the operator is not is not satisfied with the Eurofins Assurance India Private Limited appeal process, operator can submit a complaint against Eurofins Assurance India Private Limited to the accreditation body
- **Handling complaints:** Operators are free to approach Eurofins Assurance India Private Limited for any type of complaints against the Eurofins Assurance India Private Limited staff, the Eurofins Assurance India Private Limited certification system or other operators certified by Eurofins Assurance India Private Limited. Any complaints may be verbally directed to Eurofins Assurance India Private Limited staff and/or through e-mail or post to the Eurofins Assurance India Private Limited office. Complaints will be handled confidentially.
- **Standards:** The latest version of NPOP standards can be downloaded from:
<https://npop.apeda.gov.in/>

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