



# ORGANIC CERTIFICATION FOR GROUP OPERATIONS

Guidance

Group operations (also called grower groups or multi-site operations) operate under a single organic system plan and are certified as one entity. The Organic Foods Production Act and the USDA National Organic Program authorize certification of operations with multiple production units, sites, or facilities based on their organic system plan, a strong internal control system, and other oversight provided by certifying agents.

## DEFINITIONS

- Group Operation-

The group is an established **legal entity** such as a cooperative or association, and all sales of certified product are sold through the certified legal entity

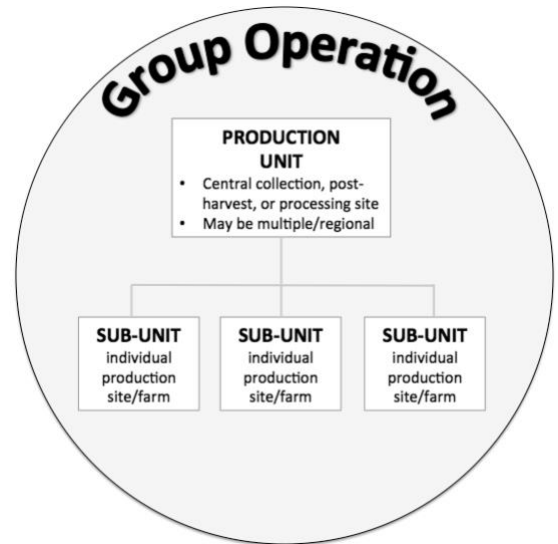
The group is managed under a **central administration**, and utilizes a central processing, distribution, and/or marketing facilities and systems

The group has a demonstrated **Internal Control System (see back for more details)** that performs internal surveillance to ensure all members comply with organic production requirements

The group members produce the **same type of product**, and the practices of the group are uniform and reflect a consistent process/methodology and recordkeeping protocols

The group members are located within **geographic proximity**, based on access to the same collection or processing facility, and/or physical features such as common soils or water source

The group members **market their product only through the group**, unless a member is individually certified.



## ADDITIONAL INFORMATION

### THE ORGANIC SYSTEM PLAN

A group operates under a single organic system plan. Members of the group abide by the practices set forth in the group operation's organic system plan, including inputs used, fertility management and pest control practices, livestock feeding and health care practices, and record keeping and audit trail systems.

### THE INSPECTIONS

Group operations receive annual on-site inspections by the certifier for the purposes of determining the group's capability to comply with the organic regulations. The certifier will inspect the functioning of the Internal Control System, as well as every production unit (generally the headquarters or common regional handling or collection facility). The certifier will also inspect a meaningful sample of group members. The sample size and composition is based on risk factors as well as random selection.

### THE INTERNAL CONTROL SYSTEM

An Internal Control System (ICS) is a written quality assurance system included in the group's organic system plan that sets forth the practice standards, record keeping, and audit trail requirements applicable at each production unit, facility, or site. The ICS also identifies the internal verification methods used to ensure that all members are consistently following the organic system plan and maintain compliance with the organic regulations. *Contact PCO for a sample Internal Control System template!*

#### RESPONSIBILITIES OF THE ICS

- Verify that the organic system plan is being implemented consistently across all members and is in compliance with organic regulations
- Ensure that all members understand the organic regulations
- Document the procedures used to implement the ICS and ensure compliance of the group
- Maintain records to demonstrate compliance of the group with ICS procedures, the organic regulations, and the organic system plan

#### PERSONNEL

- Qualified staff must administer the ICS
- Potential conflicts of interest must be mitigated

#### SURVEILLANCE (INTERNAL INSPECTIONS)

- ICS personnel must conduct annual on-site surveillance inspections of every individual member
- Surveillance inspection and review reports must be maintained by the ICS and available during inspection by the certifier

#### SANCTIONS (INTERNAL NON-COMPLIANCES)

- The ICS must establish a system of sanctions (also called non-compliances or adverse actions) to be issued to members who do not comply with the group operation's organic system plan and applicable organic regulations. The system must include corresponding corrective actions that may be taken to resolve minor or major issues.
- Sanction procedures must provide for the suspension or exclusion of members who are found to have major non-compliances. Such activities must be reported to the certifier and may lead to adverse actions by the certifier towards the group operation.

