

Maharishi Vedic Organic Agriculture Institute

P.O. Box 2006 Fairfield, IA USA
Tel: (641) 469-5477 Fax: 641-472-1754
e-mail: MVOAI@Maharishi.net
www.mvoai.com

Grower Group Certification Guidelines

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"Grower Groups" consists of farmers engaging in similar growing practices in a distinct geographic and climatic area, growing similar crops under uniform conditions, and managed, audited and monitored by an Internal Control Program (ICP). Grower group certification may also cover processing and handling activities performed and managed by the group. Grower groups may be sharing experience, information, management structure, access to market, and in many cases equipment, seed banks, input materials, warehousing, minor processing facilities, etc. At a minimum, groups shall be required to share centralized processing, distribution, and marketing facilities and systems.

In summary, Grower Group's must meet the following conditions:

- The producers must be located in close geographic proximity to one another.
- The crops and farming practices of the groups must be uniform and reflect a consistent process or methodology, using the same inputs.
- The groups must be managed under one central administration that is uniform and consistent.
- Grower groups must establish and implement a quality system called an ICP (Internal Control Program), with supervision and documentation of production practices and inputs used at each member's operation to insure compliance with the USDA's National Organic Standard.
- Grower groups must have a program of education to insure that all members understand the US National Organic Standard and how it applies to their specific operations.
- Grower groups must utilize centralized processing, distribution, and marketing facilities and systems.

At the time that a project applies to MVOAI, the Certification Committee will determine if the project can be classified as Grower Group based on whether the required Internal Control Program (ICP) can be reliably established. This decision will primarily be based on the available, local expertise and their ability to responsibly participate in helping to monitor the certification process. For an ICP project, MVOAI will conduct inspections and internal audits of the ICP annually.

If the Certification Committee determines that the local expertise and ability is not present and that the project will require 100% MVOAI inspection, an MVOAI Inspector will inspect each field and complete inspection reports for each grower. In this case the project will not be classified as a grower group, but rather a normal MVOAI client. In the case where an ICP is in effect, the purpose of this group will be to assure that the standards and policies of MVOAI, the certifying agency, are being followed, and that

there is documentation of a viable plan of action to deal with any violations of the standards. ICPs will be carefully monitored by MVOAI. All project documentation is the joint responsibility of the ICP and MVOAI who will be auditing all records for conformity.

The ICP will also monitor and document any processing done by the grower group to assure that the USDA organic integrity of the product is maintained. The ICP program will include information and training under the guidance of the Institute to help growers understand the MVOAI certification standards and procedures and how these apply to their specific operations.

Internal Control Programs

The local ICP management will need to thoroughly master all certification documentation and present a plan to MVOAI to assure that the certification documents will be well managed and that all required information needed by the Certification Committee to determine ongoing compliance can be provided in a timely manner. MVOAI will rely on the ICP if and only if it can meet the following internationally accepted criteria:

1. The ICP inspects all operators at least annually;
2. The ICP inspects all new operators before including them in the Grower Group;
3. The ICP's inspections are rigorous enough to determine operators' level of compliance with MVOAI's standards;
4. The ICP has appropriately addressed instances of noncompliance;
5. The ICP maintains adequate records of inspections;
6. The ICP's records match MVOAI's findings; and
7. The ICP assists the operators in understanding and complying with MVOAI's standards.

MVOAI requires all ICPs to submit a plan for implementation documenting that the ICP is managed in a manner compliant with MVOAI procedures. The plan must include the name of the person who will act as the ICP Administrator and the names of the group's internal Inspectors. Any change of the person in charge should be reported promptly to the MVOAI office.

The ICP must be established and functional before MVOAI will accept the Grower Group as a potential MVOAI client. MVOAI will provide specially adapted certification forms to the Grower Group where necessary for the application process.

Production Documentation for Grower Groups

Documentation is an extremely important part of the certification process. It is anticipated that grower groups will need extensive training in these procedures and in their importance. MVOAI is prepared to conduct training wherever necessary to bring Grower Group ICPs up to standards *in so much as they pertain to the accuracy and completeness of the certification process. MVOAI is not allowed by law to consult on production or processing procedures or general management and administrative procedures unless they are part of a general education program offered by the Institute to all farmers in the area.*

In order to maintain the integrity of the USDA Organic product, records must be current,

accurate, complete, and inclusive. Each year the individual producer/grower provides the grower group administrator with any necessary records who then is responsible for compiling, maintaining, and providing the required documentation to MVOAI prior to certification inspection.

The following documents and records must be maintained at the ICP central office:

1. Grower Records: The names of all persons involved in farming the land, the Grower's ID number, date of entry into the program, and date of last ICP inspection.
2. Production Records: Production records must be on file for the current year's actual or projected production. Historical records must also be available showing production in previous years. Sale or delivery records must indicate how the crop was dispensed of including quantity, lot number, and location where delivered. Sales records must include date of sale, quantity sold, method of transportation, customer's name, and documents issued. Project feedback forms must be available to all growers. These records must be processed by the ICP office and forwarded to MVOAI.
3. Farm /Project Plans, either individual, collective, or both depending on the situation. The Farm/Project Plan provides information on growing practices that allows MVOAI to assess the Grower Group's compliance with the standards. The Plan also provides information on the internal operation and administration of the program.

MVOAI requires a completed Farm/Project Plan to be filed at the MVOAI office for any Grower Group client. Yearly updates must be submitted which report any and all changes to information reported on the initial form. Should major changes occur, the Farm/Project Plan must be revised and resubmitted to MVOAI in advance of the inspection.

The Project Plan also identifies the group's ICP Certification Manager who deals directly with MVOAI in all areas concerning certification and who is responsible for the management of the ICP of the operation. The Plan must also identify, if different from or in addition to the Certification Manager, the internal control Inspectors, monitoring staff, and staff providing education for the growers. Any change or planned change to the staff member holding the position of Certification Manager must be reported promptly to MVOAI.

Field Maps: Field maps show the location of the fields(s) being certified and provide information about the surrounding land usage. The map(s) must indicate all buffer zones (including the actual distance to neighboring crop or irrigation lines) and highlight areas of possible contamination. Maps must include a notation of the prevailing wind direction and any other information that is relevant to predicting the potential for contamination of the field; e.g., the slope of the land, runoff information, likelihood of wind drift if down hill, and crops grown down

wind of an aerially sprayed crop. Maps must show all natural barriers. If possible, maps must indicate water sources for the field; if the map cannot show the water source, an explanation should be provided.

4. Field Histories: Field histories for each grower and field must be on file for the past three years and current year, showing all inputs used on the farms, both from off-farm and on-farm sources, the crop rotation program employed, and any insect and disease control measures taken. For inputs, the type of material, the application density, the total quantity used, the purpose, and the reason for application should be noted for each field. This information should be verifiable through documentation and receipts. Needed documents and receipts or labels are to be provided by the individual producer or by the grower group coordinator. For on-farm inputs, records are to be maintained concerning the source, composition, analysis if available, and the method of production. Field histories must be retained for at least five years.
5. Grower Agreements: Grower Agreements are to be on file at MVOAI and at the ICP office. These may be done individually or collectively at the discretion of the MVOAI Certification Committee. For collective agreements, every grower must sign the documents.
6. MVOAI/Grower Group Agreement: A contractual agreement between MVOAI and the Grower Group regarding implementation of the ICP and the name of the ICP Administrator must be current and on file.
7. ICP administrative procedures documentation must be current and on file. These include copies of the forms used for internal control, policies regarding violations and sanctions, procedures for removal of members of the Grower Group, and procedure for appeal.
8. Training records including proof of adequate training for all ICP Inspectors must be current and on file;
9. Documentation demonstrating that the grower members have received instruction about the MVOAI Standards and Policies must be current and on file;
10. Copies of all ICP inspections.
11. Records of infractions or violations noted during the ICP's inspections of growers. These records must detail the ICP's management of the investigation of the violation, and where appropriate, the actions taken in response to a confirmed violation.
12. Records showing that the ICP Administrator has reviewed the inspection including comments about the inspection and management of violations noted by the Inspector.

Processing and Handling Documentation

Handling Documentation

Grower Groups which act as handlers of products are responsible for maintaining the audit trail of these organic products. When acting as a handler that does take physical possession of product, a Grower Group may not repackage or process product in any way while it is in their physical possession. In addition, Grower Groups that physically handle product must comply with standards on post-harvest handling, storage, transportation, and structural pest control.

Processor Documentation

The MVOAI visiting Inspector will inspect Grower Group processing facilities annually. On the daily basis, however, the ICP provides the necessary quality control. Inspection documents generated by an ICP inspection of a processing facility must be reviewed by the Manager of the processing operation and the ICP administrator so that any necessary corrective actions may be taken in a timely manner. All corrective actions must be documented.

Processing documents must be detailed enough to allow an Inspector to confirm that there has been no contamination of the product, either through co-mingling or through accidental contamination from a mechanical source. Furthermore, material and product flow auditing will be applied by the MVOAI Inspector to assure that MVOAI's standards are being met.

Grower Groups acting as Processors of Organic products shall be required to keep the following records. These records are maintained by the ICP and presented to the MVOAI Inspector for review and evaluation at the time of inspection:

- (a) Product Receiving or Incoming Product Logs: These logs list all incoming products into the processing/handling system using an identifying lot number that will allow tracking to a specific producer. In cases where product is received without a lot number, the processing facility should assign one.
- (b) Warehouse Inventory Log of Raw Materials: The information contained in this log specifies all raw material products received and maintained in storage. All products are to be clearly identified with lot numbers that are the original receiving lot number. This log should be able to be reconciled by the MVOAI Inspector at the time of inspection. The log should list raw product movement in and out of the warehouse, location where the product is stored in the warehouse, and current quantity remaining on hand at all times and any waste or gain factor relevant to storage.
- (c) Production Logs: These logs show the use of specific raw products being used in the production and processing using the system of lot numbers. The log must allow tracking of the product back to the original producer through the various logs specified previously. The log should specifically note the date of

production, the production shift, quantity and source and lot number of raw product used, quantity of finished product returned to the warehouse, changes in lot number, and the disposition of the finished product.

- (d) Quality Control Logs: The Quality Control Logs monitor the quality system and the status of the processing facility. These logs include the listing of all inspections, both internal ICP inspections and external inspections by MVOAI or the USDA, sanitation logs, maintenance logs, pest control log, product contamination log (listing all instances of contamination due to mechanical failure or breakdown, including disposition of the contaminated product), product test logs, etc.
- (e) Warehouse Log (finished product): This log contains the information pertaining to the finished product: lot number, location in warehouse, quantity produced. All final products must be able to be reconciled back to the incoming lot number.
- (f) Shipping Log: records all information concerning the outbound movement of the finished product.
- (g) Corrective Actions Log: This log is used to record any action taken to correct noncompliance with the policies and/or standards.

The Inspector will evaluate the completeness and accuracy of all these logs during the processing and handling inspection. Through the use of the above-mentioned documents, the Inspector should be able to confirm that the product meets all quality and purity standards.

Monitoring and Evaluation of ICPs and Grower Group Programs Inspections (General Points)

Inspections of Grower Groups will be of two types. The first type of inspection is an internal inspection of all growers by the ICP Inspectors. This must be completed and a representative sample of the documentation sent to MVOAI before the initial visit by the MVOAI Inspector. This process must be repeated on an annual basis thereafter. Failure to comply and to complete the ICP inspections will delay the scheduling of the annual MVOAI inspection and could jeopardize certification of the project.

The second type of inspection is the MVOAI inspection. Grower Groups using ICPs may be required to have two MVOAI inspections the first year — one to gather initial overview information on the project, and a second, later in the year, to further evaluate and assess the implementation and accuracy of the Internal Control Program. In subsequent years, MVOAI Inspectors will pay an annual visit to complete their inspection tasks. Unannounced visits by an MVOAI Inspector may be made in accordance with the terms outlined in the Grower Agreement.

ICP Inspections of the Grower Group

The ICP inspections form the real heart of the Grower Group inspection process. All

members of the Grower Group must be inspected annually by the ICP Inspectors. The following are the required elements of the ICP inspection report:

1. Names of each of the growers including their assistants
2. Grower identification number
3. Date of last inspection by the ICP, indicating who was present at the inspection
4. Date of last MVOAI inspection
5. Current land use, including a review of maps and field histories
6. Crop rotation plan for the year of inspection
7. Number of hectares of land in use for the current year and any changes from the previous year
8. The condition of this year's crops including any deviation from the norm. Any crop problems should be analyzed as to their effect on harvest and their likelihood of presenting a continuing problem.
9. Report on the current year's crops including estimated production and harvest plans
10. Report on production inputs, both off-farm and on-farm. Labels or purchase receipts for all off-farm inputs should be provided. The inputs report should include a description of the fertilization program, and the insect and disease control programs for the current year.
11. Adjacent land use including buffer distances between fields and neighboring fields and any applications to neighbor's field that may affect the organic integrity of the crops.
12. A detailed report should be provided on possible contaminants including a map and the reasons for concern, taking note of possible solutions to the problem, the extent of the threat, and time frame and extent of the exposure. All corrective activities and their resolution should be included.
13. This season's climatic conditions including any significant variations from the norm.
14. Grower comments on the effectiveness of the ICP and the overall Certification Program.

MVOAI Inspections

During each MVOAI annual inspection visit, the MVOAI Inspectors will conduct a thorough review of the ICP, its practices, policies, and records, and perform an actual inspection of a minimum of 15% of the growers to assess the effectiveness and compliance of the production units or growers. The MVOAI Certification Committee will determine exactly how many growers will need to be inspected based on the number and size of operations associated with the Grower Group, the degree of uniformity of farming practices, the complexity of the current crop production systems, the Group's familiarity with organic practices and standards, the types of production practices used during the last 5 years, and the effectiveness of the Group's ICP.

The following are the duties and responsibilities of the MVOAI Inspector during his/her initial and annual visits to the Grower Group. All procedures and documentation listed below are either in addition to or supplemental to any of the standard documentation and reporting done by Inspectors described elsewhere in this manual.

- (a) The MVOAI Inspector should verify that all required ICP inspection documents are on file for each grower and field in the project. 100% of all fields and facilities must have been inspected and 100% must have ICP documents on file.
- (b) The MVOAI Inspector will randomly select copies of the ICP documents to be checked while conducting his own field inspections. Any discrepancies between ICP data and the Inspector's own observations and data will be noted on the documents that were selected including the dates of both inspections.
- (c) ICP and grower documents are reviewed for accuracy, completeness, and for any possible compliance problems that require resolution.
- (d) After completing the inspection, if discrepancies are found or misinformation has been provided on the ICP documents, the Inspector investigates and resolves the reason for the misinformation with the help of the following possible sources of the problem:
 - (i) Did the same person conduct all the inspections that are in question or could the discrepancy be due to different Inspectors and inspection methods?
 - (ii) Is the problem widespread throughout the ICP?
 - (iii) Are there weaknesses in the ICP policies, procedures, and methods of operation that may be causing the problem?
 - (iv) Is it a training, communication, skill or competence deficiency? Can it be corrected through further training?
 - (v) Were the violations accidental or willful?
 - (vi) Were the infractions minor or major? Can they be easily corrected?

The Inspector will report his/her evaluation of the ICP and the production system to the MVOAI Certification Committee in the inspection report and its accompanying comments. He/she should give his/her overall assessment of the ICP success and ability to follow the Project Plan and to implement the MVOAI guidelines. He/she should discuss any corrective actions taken and by whom. The Inspector's report could summarize the following information:

- (a) Percent of fields inspected and documents reviewed
- (b) Percent of documents found missing or with errors
- (c) Analysis of why the documents were incorrect with suggestions for improvement and explanations offered by the ICP personnel
- (d) Explanations of the workings and actions taken by the ICP in performing its monitoring duties and review of their documentation on such actions

Evaluation and Decision Making for Grower Groups

Monitoring and evaluating of Grower Groups will be performed in two parts: the evaluation taking place at the MVOAI central office based on documentation received and those checks occurring on location at the farms. At MVOAI, the Inspections Manager and the Certification Coordinator will review all documents and records received from the Grower Group for thoroughness, accuracy, completeness, and consistency with MVOAI policies and procedures. The grower lists and farm/processor/handler programs and plans will be compared to the list of growers and

the on-file Farm/Project Plan. The Inspector and the ICP will be informed of discrepancies or missing documents. All missing documents are to be completed and received by MVOAI prior to the arrival of the MVOAI Inspector. The MVOAI inspection might be delayed should the number of missing or incomplete documents warrant it. If the ICP or its records and procedures are found to be ineffective, flawed, inaccurate, incomplete, etc., the MVOAI Certification Committee will have three options:

Option 1. Delay certification or re-certification until ICP personnel can guarantee all fields have been ICP inspected and the reports filed with MVOAI. This option assumes that the Grower Group is not out of compliance in any major way. Those ICP documents that have been found to be unsatisfactory must have been corrected and the personnel responsible been retrained or dismissed. An MVOAI Inspector must conduct a follow-up inspection at the client's expense to insure that missing information gathered is correct.

Option 2. Require that the project be 100% inspected by MVOAI prior to certification or re-certification. This means that a team of MVOAI Inspectors will be required to conduct a follow-up inspection to cover fields not inspected during the initial inspection. The ICP will be re-evaluated to determine if it can be re-established for future years.

Option 3. Apply sanctions. MVOAI will enforce sanctions on the Grower Group if the ICP is not able to uphold MVOAI policies and standards. Noncompliances will be reported to the USDA National Organic Program director as detailed elsewhere in this manual.

Policy Regarding Adding Growers to a Grower Group

New growers may be added to an established grower group before each annual MVOAI inspection. They must conform to the "similarities" requirement with the main Grower Group meaning that their activities, procedures, crops, methods, abilities, training, etc. is in harmony with the group.

When a Grower Group wishes to add members, the Grower Group should submit the names, addresses, and contact information for the new applicant to the main MVOAI office providing all details as specified in this manual. MVOAI in conjunction with the ICP will then send copies of all necessary documentation including the farm/production/processor/handler plan to the applicant to fill out and return to the ICP Manager in order to determine preliminary eligibility and schedule an inspection during the ICP inspection. Final acceptance of the new grower will only come after an ICP inspection and review by the Certification Committee of all pertinent facts. MVOAI will invoice the Grower Group for any additional fees for the new producer.