

Key ICS procedures and documentation requirements

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- Contract & Membership
- Key staff
- Organisational chart
- Conflict of interest
- Trainings
- Registration procedure
- Farm and member documentation
- Subcontracted/outsourced activities

Summary: Key Naturland requirements for ICS

In general:

Basic requirements for ICS as defined by **Regulation (EU) 2018/848**



+ Additional Naturland-specific requirements

- ✓ Contracts & membership
- ✓ Documented procedures and implementation of the ICS
- ✓ Naturland standards (incl. social responsibility)
- ✓ Product flow & traceability



➔ see Naturland ICS Manual + Naturland ICS minimum requirements



Contract and membership



Documented procedures and implementation of the ICS

Training of the ICS inspectors & members

(i.e. training records)

Risk management

(i.e. risk assessment and precautionary measures)

Traceability & product flow

(i.e. measures for preventing contamination and commingling)

Approval & sanctions of members

(i.e. measures for addressing non-compliances)

Key ICS staff

(i.e. selection and contracting, organization chart)

Organic production & processing rules

(i.e. internal standards)

ICS documents & records

(i.e. registration of new members, members agreement, list of members)

Internal inspections

(i.e. internal farm inspection checklist, internal inspection report)



Reg. 2018/848 Art. 36.1 (g & h)



Naturland ICS minimum requirements



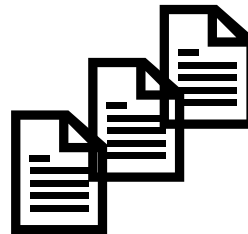
Control of documents and records

The ICS defines **procedures** and **rules for documentation and record keeping**.

These may be compiled as



One document (ICS Manual)



Set of documents

Include reference
to Naturland



- Must be kept up to date
- Inform staff and members about relevant updates or changes
- Develop common templates

Organisational structure and capacity – Key ICS Staff

1. **ICS manager** – responsible for operation and quality, coordinates staff, contact for external inspection
2. **Internal inspector** – carries out inspection
3. **Organic Purchase Staff** – ensure organic integrity during buying/selling, signs traceability documents (receipts), ensure separation, cross-checks of harvest estimates
4. **Field officers** – train and support growers
5. **Organic Approval Committee** – supporting the decision-making regarding approval and sanctioning

MUST HAVE



RECOMMENDED

Appointment of ICS Management:

The ICS management can be delegated to the company that processes or exports the products of the GoO
→ must be documented in writing, with clearly defined responsibilities, and communicated to Naturland

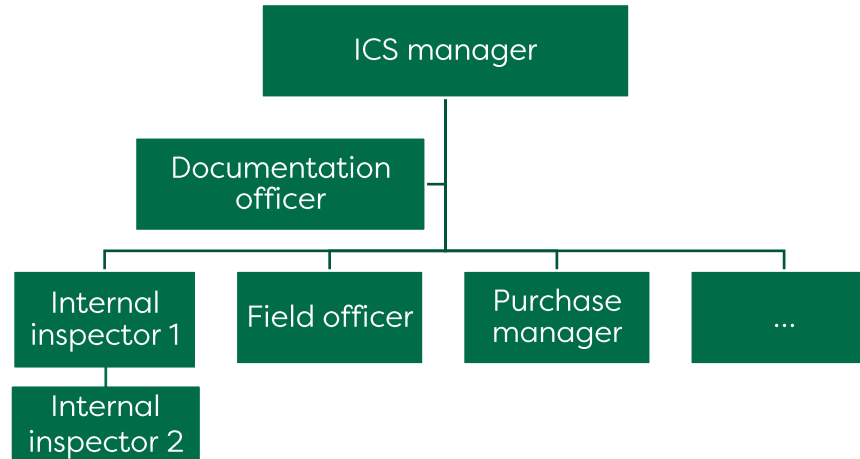


Organisational Chart



keep an up-to-date organization chart

- display the structure of the group.
- clearly define roles and responsibilities
- update regularly



Conflict of interest

| Situations for potential conflicts of interest | Key roles |
|---|---|
| Close family or friendship relation with group members | ICS manager, Internal inspectors, Approval committee, purchasing staff, other staff |
| Private business relationship with group members (e.g. trading products of a certified members in own business) | ICS manager, Internal inspectors, Approval committee, purchasing staff, other staff |
| Young age, especially when respect by elders is a must | ICS manager, internal inspectors, Approval committee |
| Responsibility for purchasing of raw materials from group members | ICS manager, Internal inspectors, Approval committee |

All possible conflicts of interest need to be declared in a written statement (conflict of interest declaration), listing all relevant interests that could jeopardise the decision-making within the ICS. Not only the ICS manager, the internal inspectors but also the purchase staff and approval committee need to sign such a declaration and update it regularly.



The ICS manager – conflict of interest

The ICS manager must not be an internal inspector!

Additional Naturland requirement:

- The ICS manager must not be responsible for the purchase/marketing of conventional products and operating resources.
- The ICS manager must not have a managerial position in a conventional operation.
- In case there are responsibilities related to conventional products, inform Naturland



Note:

**Conflict of interest
declarations must be
available**

Organisational structure and capacity – Training

All ICS staff and members must receive initial training and regular updates on relevant aspects (organic standards, ICS regulation etc.)



Training for opportunities must be well documented (list of participants, agenda, training content), → check by external inspector

Risk-based training → identify common areas where improvement is needed → targeted training sessions (i.e. common non-compliances, specific standard requirements, risk mitigation etc...)

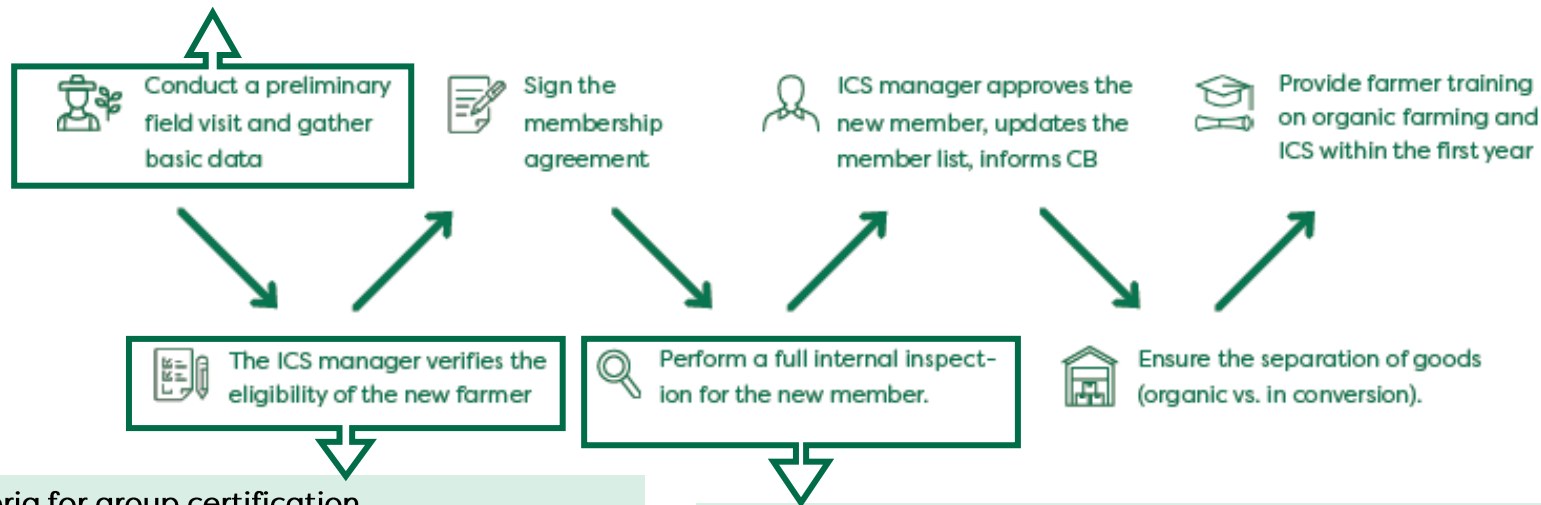


POLLS

– compare recording –

Registration of new members or plots

- Collect basic information about farmer and farmland:
contact details, location, crops, farming method, field history, hired labour, storage/processing, collection points
- Create farm map
- Identify risks



Check criteria for group certification

- Organic/in-conversion farmer in geographic proximity
- Farm size /organic turnover
- membership with other groups
- farmer group < 2000 members

- Monitor the conversion
- Check for retroactive recognition
- Follow up on corrective measures or sanctions



Registration of new members or plots



Obligatory records for registration:

- Membership agreement
- List of members
- Internal inspection report
- Traceability records

Farm and member documentation: List of members

List of members with additional Naturland info:

- Farmer name and code
- Total land of farmer (incl. not certified plots)
- Information on each field and/or activity
 - field size
 - Location and geographical coordinates
 - Products and main use (export, self-consumption, local market)
 - Date of the beginning of the conversion period
 - Yield estimates
- Date of last internal inspection, name of internal inspector, approval/sanction decision

Document:

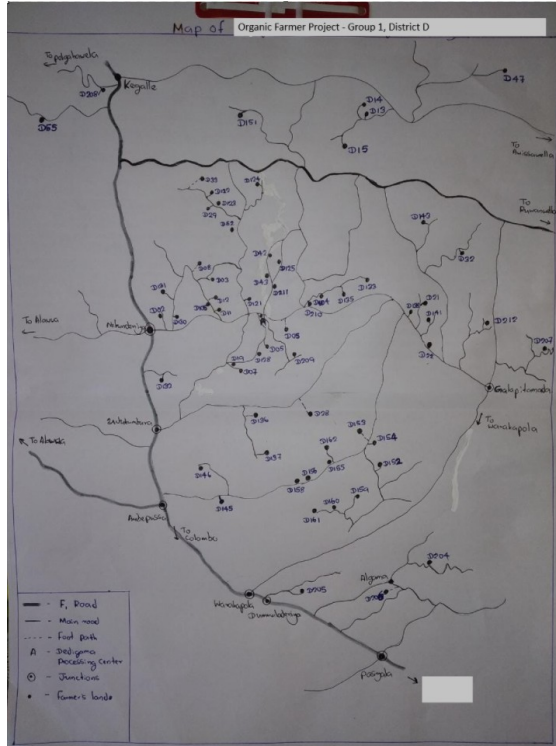
- Yield estimate
- Real harvested quantities
- Volumes purchased by ICS

+ Information whether the farmer has **hired labour**
+ Membership in more than one group, if applicable (must be approved by Naturland)
+ Indicate clearly the **certification scope of farmers (EU organic/Naturland) + other certification** e.g. BioSuisse, Demeter



+ Maintain list of sanctioned farmers incl. reasons of sanctioning

Overview map and individual farm maps



Example: Boundaries between adjacent plot

Farm and member documentation: Membership agreement

The farmer commits to:

- Comply with the organic production rules and relevant regulations/standards
- Comply with ICS procedures and documentation requirements
- Provide access to all fields, facilities and documents.
- Accept potential sanctions and corrective measures
- Inform the ICS about any changes



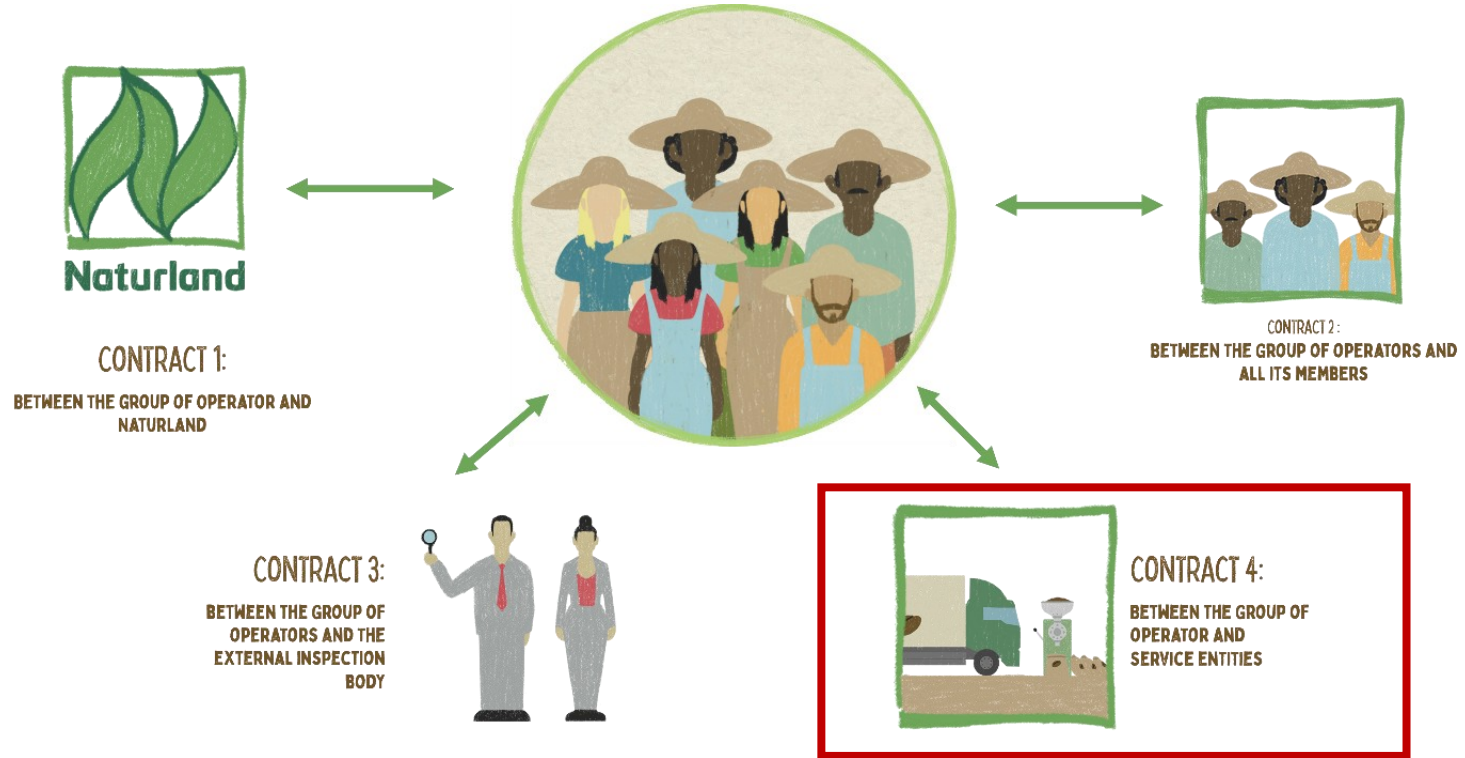
Include reference to Naturland and relevant Naturland organic/social standard requirements

| | |
|---|--|
| 1. I as farmer declare that I understand the standards for organic agriculture of which the most important aspects are: | |
| <ul style="list-style-type: none">■ No use of disallowed substances like artificial fertiliser or chemicals (herbicides, pesticides, insecticides, fungicides)■ Maintenance and improvement of soil-fertility by an appropriate combination of use of animal excrements, green-manure and cultivation of legumes■ Control pests and diseases by natural ways and control weeds by hand or mechanically■ Use of organic propagation material■ Avoid contamination of fields and products with disallowed substances.■ Label the certified products correctly as organic or under conversion to organic. | |
| 2. I declare that I work on my fields included in the inspection-programme and during the on-farm first processing of products, conform the above mentioned standards for organic production. | |
| 3. I will allow inspectors access to all my fields and premises for inspection purposes and I will fully co-operate with them. | |
| 4. Only if no farmer-group: I declare that <ul style="list-style-type: none">■ Detailed map of the fields is maintained.■ Adequate written bookkeeping of all incoming and outgoing products is available. | |
| 5. In case of non-compliance with the above-mentioned standards I will inform the above mentioned field officer and/or ... and I will not sell the products as organic or under conversion to organic. Also, I will inform in writing the buyers of the products in order to ensure that the indications referring to the organic production method are removed from the product in question. | |
| Date and signature of farmer | |
| Date and signature of field officer (if any) | |

→ Naturland?

Should be available in local language + must be easily understood by the farmer!

Outsourced Services



Outsourced Services / Subcontracted Activities

- Keep **agreements** for any outsourced service or subcontracted activity
- Prepare **internal control procedures** (e.g. internal inspection, documentation + record keeping, training, risk management)
- **Inform Naturland** about outsourced services or subcontracted activities



Collection / Transport by independent collectors



ICS management done by company

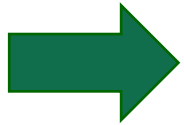


Subcontracted storage / processing / preparation

Verify compliance with the Naturland standards (e.g. social responsibility)!

Documentation - Summary

In general: No obligatory format for the documents or lists, can be flexible



But: information needs to be documented

Samples/Templates available in the Naturland ICS Manual

Templates provided by your CB usually also ok – but adjust or add for Naturland



Summary: compulsory records for ICS

- List of members
- Membership agreements
- Internal inspection reports
- Training & Conflict of interest records for all staff
- Training records of members
- List of sanctioned members, non-compliances and follow-up measures
- Traceability records
- Subcontracting agreements
- Appointments of ICS manager & internal inspectors



See Regulation (EU) 2021/279 Art. 5

POLLS

– compare recording –