

ORGANIC PRODUCTION REQUIREMENTS

A Practical Guide for Groups

Practical guidance on group organization, leadership, membership management, internal rules, meetings, record keeping, and accountability within the Internal Control System (ICS).



For Farmers, ICS Inspectors
and Farmer Groups



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Knowledge Hub for
Organic Agriculture
in Eastern Africa

ABOUT THIS KNOWLEDGE PRODUCT

This knowledge product is part of the ICS Training Set and presents the key learning areas covered on Day 1 of the ICS training curriculum for EU organic certification.

Day 2 focuses mainly on the Group of Operators and the management of the Internal Control System (ICS).

Who is this guide for?

- Farmers
- ICS Inspectors
- ICS Managers
- Farmer Groups
- Extension Officers

Contents

- Understanding a Group of Operators (GoO) requirements
- Eligibility and responsibilities of group members
- Organisation and management of the ICS
- Internal approval and management of non-compliance
- Training and ongoing support of farmers
- Traceability and product flow control within the group
- Maintaining organic integrity from production to group sales

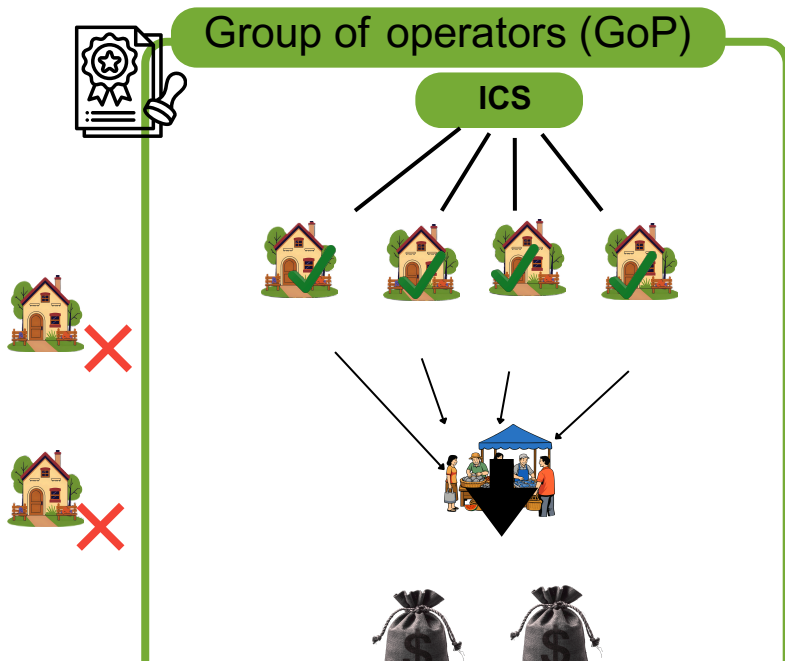
How to use this guide

Use it as a quick reference during ICS training, group establishment and management, internal inspections, farmer sensitization, documentation, traceability checks and field follow-up.

Members Eligibility:

What is a Group of Operators

A Group of Operators (GoO) is a group of farmers who work together under one Internal Control System (ICS) for organic production and joint marketing



Key requirements

- Maximum 2,000 members committed to organic production
- Members are generally small-scale farmers: <5 ha total land OR <€25,000 organic turnover
- The group has a legal identity
- It operates an ICS with joint marketing system
- Members are in geographic proximity
- A farmer registers with only one GoO for the same product

Members Eligibility 01

What about preparation activities?

Art 36.1 (a) defines that a Group of Operators shall... only be composed of members who are **farmers or operators that produce algae or aquaculture animals** and who in addition may be engaged in processing, **preparation** or placing on the market of food or feed. Examples of preparation activities

1 Vegetable washing



2 Vegetable sorting



3 drying coffee



4 husking nuts



Where can preparation take place?

- On the farm
- At a central collection centre
- At facilities of one or more group members
- Then add one short takeaway beneath it:

A certified Group of Operators may carry out preparation activities as part of its joint marketing system.

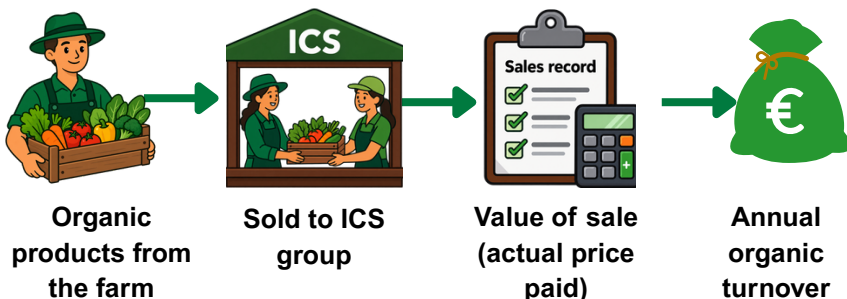
Members Eligibility 02

How to Determine Annual Organic Turnover



A member's organic turnover is the annual value of organic products sold by the member to the Group of Operators (GoO/ICS).

HOW IS IT CALCULATED?



KEY POINTS

- Add up all organic sales made by the member to the group during the previous accounting year.
- Use the actual price paid to the member for the products.
- Calculate the value in local currency.
- Subsidies are not included in the turnover calculation.

Members Eligibility 03

How to determine the acreage of a member?



A member's holding means all agricultural production units managed by that member, not only the organic fields. The ICS must record the total land surface under the member's management and keep this information up to date.

WHAT IS INCLUDED

- Organic fields
- Non-organic fields
- Fallow land used for rotation
- Other agricultural production units managed by the member

Key to note:

- Organic land + Non-organic land + Fallow/rotation land = Total holding
- If a farm is more than 5 ha AND its annual organic turnover is more than €25,000, it cannot be a member of the GoO. If it wants to sell products as organic, it must obtain its own certification from a Certification Body (CB).

Members Eligibility 04

farmers' societies with non-organic statutory members

Can a group of operators certified as organic (Regulation (EU) No 2018/848) consist of members who are not organic farmers or organic operators that produce algae or aquaculture animals ?

No. A cooperative with both organic and non-organic statutory members cannot be certified as a Group of Operators (GoO) for organic production. All statutory members of the legal GoO must meet the eligibility requirements, including compliance with organic rules.

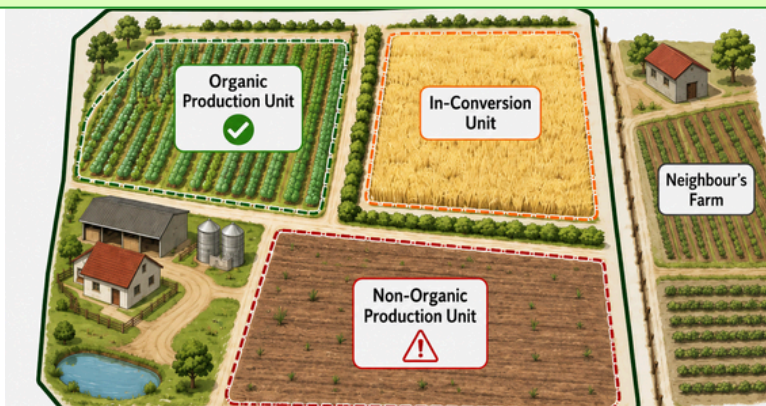
What can the cooperative do?

The eligible organic farmers may form a separate subgroup or association that has its own legal personality. This separate group can then apply for certification as a GoO.

Members Eligibility 05

What about mixed production by farmers ?

A farmer may still be a member of a Group of Operators even if only part of the holding is managed organically. However, the ICS must take into account all fields and production units under the farmer's responsibility and verify that organic and non-organic activities are effectively separated.



- Control the entire agricultural holding managed by the member
- Ensure non-organic activities occur only on clearly defined and separate parcels
- Verify strict separation between organic and non-organic production
- Check that contamination or mixing is avoided ensure all crops within the organic production unit are managed according to organic production rules

ICS Must:

Members Eligibility 06

Can farmers Sell to more than one buyer?

Can a farmer belong to more than one GoO?



- A farmer can only register in one Group of Operators (GoO) for the same product.
- For example, a farmer cannot be a member of two different GoOs for coffee. However, the same farmer could belong to one GoO for organic mangoes and another GoO for coffee. This creates a higher risk and requires careful ICS management.

Can GoO members sell to other traders?

- Yes. Farmers may also sell part of their production to local traders.

However:

- Only products marketed through the GoO are certified organic.
- Products sold to other traders are not certified organic.
- The ICS should monitor these sales and include them in the group's traceability system

Members Eligibility 07

How to deal with changes at member's level?

1. What if a Member No Longer Meets the Eligibility Requirements?

A member of a certified Group of Operators must continue to meet the GoO eligibility requirements.

If a member no longer:



qualifies as an eligible farmer/operator



complies with organic production rules, or



remains within the permitted farm-size or organic-turnover limit



The member cannot remain part of the certified GoO legal entity.



Key message:

Eligibility is not checked only when a farmer joins the group. The ICS must continue monitoring whether members remain eligible over time.

Members Eligibility 07

How to deal with changes at member's level?

2. Maximum Size of a Group of Operators

Group of operators



A GoO may have maximum **2000 members**

If a cooperative has more than 2,000 eligible farmers, it cannot place all of them under one certified GoO.

Instead, it must establish separate GoO legal entities, each with no more than 2,000 members.

Each GoO must:

- Have its own legal personality
- Consist only of eligible organic or in-conversion members
- Meet the requirements for certification as a GoO

A large cooperative may therefore have several certified GoOs associated with it, but the different GoOs cannot share the same legal personality.

Legal Personality of a Group of Operators



A Group of Operators must have its own legal personality. This means the GoO must be recognized under national law as a separate legal entity with its own rights and obligations. Depending on national law, this may include registration and the ability to own property, enter into contracts, and act independently as a legal entity.

Important requirements

- The legal entity must be composed only of eligible farmers or operators.
- The legal form should allow members to be removed if they no longer meet GoO eligibility requirements.
- A GoO may still cooperate or have contractual relationships with another organization, such as a larger cooperative.
- However, the GoO must maintain its own separate legal identity.

Key message

A GoO can take different legal forms, but it must have its own legal personality and be composed only of eligible members.

Geographic Proximity

Members of a Group of Operators must carry out their production activities in geographic proximity to one another and within the same country

The EU rules do not give one fixed distance that defines geographic proximity. Instead, the group must show that members are located close enough for the ICS to operate effectively

Why does proximity matter?

Geographic proximity helps the ICS to:

- Conduct internal inspections efficiently
- Provide farmer support and follow-up
- Manage documentation and communication
- Monitor production and compliance
- Reduce operational difficulties and costs



- Where farmers are spread across different areas, the GoO may organize them into regional clusters, but it must still demonstrate that the ICS can manage them effectively.

Key message

- There is no fixed kilometre limit, but members must be close enough for the ICS to function effectively.

Processor/Exporter-Driven Groups

- A processing or export company with contracted farmers cannot itself be certified as a Group of Operators (GoO) because the GoO **must be a legal entity composed of eligible farmers**.
- Where farmers are linked to a processor or exporter, one or more separate farmer-owned legal entities must be established and certified as GoOs.
- Each GoO must have its own legal personality and be composed only of eligible organic or in-conversion farmers.

What about “100% external control” groups?

Under the new EU Regulation, group certification based only on 100% external inspection without a formal ICS is **no longer allowed**. Farmers must either:

- Form a GoO with an ICS, or
- be certified individually.

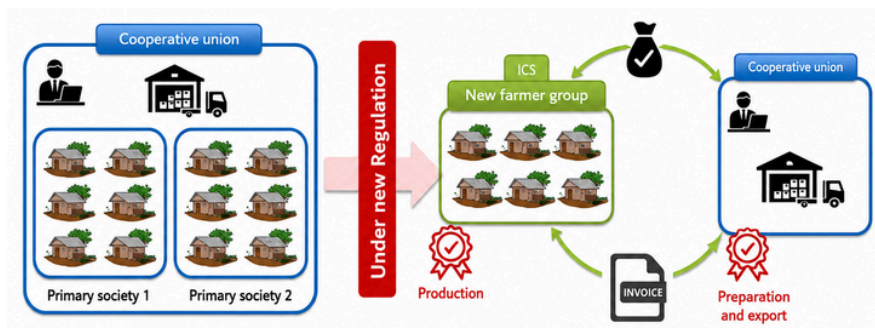
Can the processor/exporter still support the GoO?

Yes. The GoO may appoint the company to operate parts of the ICS or subcontract activities such as:

- Farm-gate collection
- Transport
- Traceability
- other operational services

However, the GoO remains responsible for joint marketing and organic integrity. Processor/exporter may support the GoO, but the GoO remains responsible.

Can a Union of Cooperatives Be Certified as a GoO?



- A union or higher-level association of cooperatives will often not meet the GoO definition, especially where it includes non-organic members or has more than 2,000 members.

There are two possible arrangements

- Option 1: Fully organic primary societies may each be certified as their own GoO, while the union provides ICS support and markets the organic products.
- Option 2: The union may help establish a new registered farmer association made up only of eligible organic members, which can then be certified as the GoO.

A union itself may still act as an operator that prepares, markets or exports products from certified GoOs.

The background features abstract organic shapes. A large dark green circle is at the top, partially cut off. Below it, a light orange shape is visible. A large, solid green shape occupies the bottom half of the frame, serving as the background for the text.

ICS Requirements for a Group of Operators

ICS Requirements



Documented Procedures

e.g. ICS registration & approval new members,
ICS inspections, measures
in case of Noncompliances



ICS Documents & Records

Member list with details
“membership” agreements
Inspection reports
Various other records



ICS Manager & ICS inspectors

Annual training of internal
inspectors

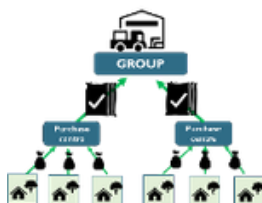


Internal inspections
of 100% of members



Managing Non-Compliances

& notice to CB if
members
suspended/decertified



Traceability & product flow
control and records



Farmers Training
(annual)

ICS Procedures

A Group of Operators must have documented procedures that explain how the Internal Control System is implemented and managed. These procedures provide the framework for member registration, inspections, training, records, non-compliance management and traceability

The ICS shall have documented procedures on:

- 1.Registration of GoO members
- 2.Internal inspection of all group members
- 3.Approval of new members or new units/activities
- 4.Training of ICS Inspectors
- 5.Training of GoO members
- 6.Control of documents and records
- 7.Measures in case of non-compliances: Describing how the ICS manages cases where organic or ICS requirements are not followed
- 8.Internal traceability of products

These documented procedures are often brought together in an ICS Manual, which serves as a reference for how the group's Internal Control System operates.

Remember

The ICS should not depend only on verbal instructions — its key control procedures must be documented.

ICS Manager & ICS Inspectors

The ICS manager's role requires a senior position in the organisation with the authority, management & technical skills to manage compliance.



Key responsibilities of the ICS Manager

- Verify member eligibility and approve new members
- Ensure every member has a contract
- Prepare and maintain the list of members
- Develop ICS procedures and forms
- Ensure ICS records are complete and up to date
- Assign tasks to ICS Inspectors
- Schedule and oversee internal inspections
- Act as the link between the GoO and the Certification Body
- Decide when the Certification Body must be notified
- Ensure annual training of ICS Inspectors and assess their competence
- Ensure training of GoO members
- Decide on measures in cases of non-compliance
- Decide on subcontracted activities and sign agreements

The GoO must appoint a sufficient number of competent ICS Inspectors to carry out annual internal inspections of all members. The ICS Inspectors must:

- Receive annual training
- Conducted Knowledge and competence assessment
- Submit a conflict-of-interest declaration every year

Note: The same person cannot serve as both ICS Manager and ICS Inspector.

Compulsory ICS Documents & Records

Compulsory Document	Minimum Content
1. List of Members	Farmer's name, identification and contact; date of registration; total land managed; organic/in-conversion/non-organic status; production unit size, location, crops, start of conversion and yield estimate; date of last internal inspection; name of ICS Inspector.
2. Signed Membership Agreement	Commitment to comply with EU organic rules; cooperate with the ICS including record keeping; permit access for internal and external inspections; accept measures in case of non-compliance; immediately inform the ICS Manager of suspected NC.
3. Internal Inspection Report	Member name; location of production units including purchase and collection centres inspected; inspection date and start/end time; inspection scope; report issue date; name of ICS Inspector; documentation of identified non-compliances.

Compulsory ICS Documents & Records

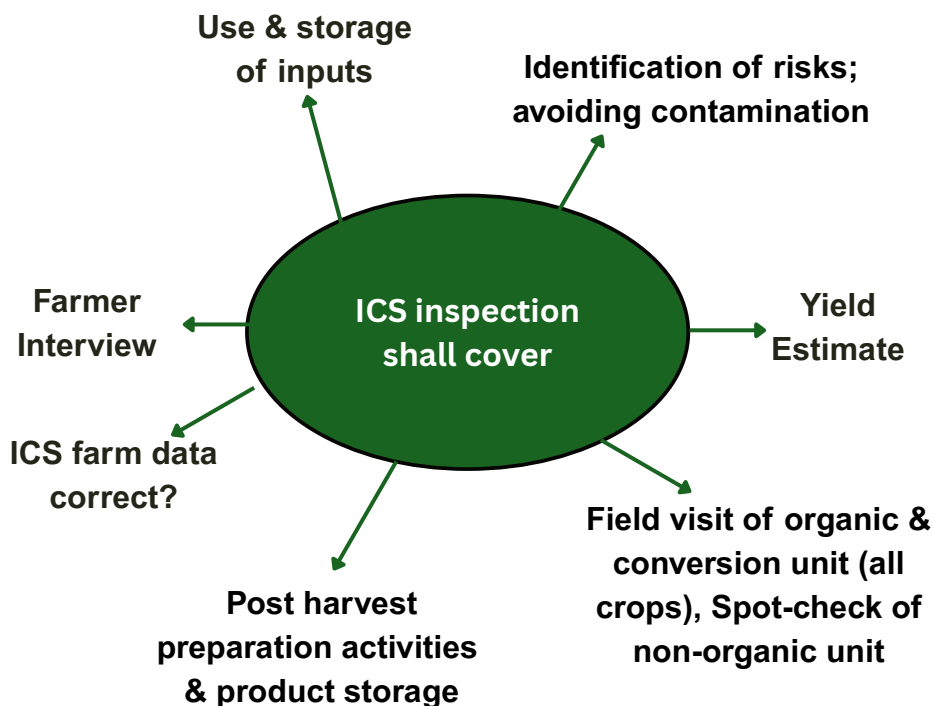
Compulsory Document	Minimum Content
4. Training & Conflict-of-Interest Records of ICS Inspectors	Training date(s); subject matter; trainer's name; assessment of knowledge acquired where appropriate. Conflict-of-interest records must also be maintained for ICS Inspectors.
5. Training Records of Members	Training date(s); subject matter; trainer's name; and, where appropriate, assessment of knowledge acquired.
6. Records of Measures Taken in Case of Non-Compliance	Identification of the affected member; measure taken, such as suspension, withdrawal or a new conversion period; documentation of the non-compliance; documentation of follow-up actions.

Compulsory ICS Documents & Records

Compulsory Document	Minimum Content
7. Traceability Records	Farm-input purchase/distribution; harvest and field records; storage records; preparation records; delivery of products by each member to the joint marketing system; group sales; supplier and buyer/importer details; supplier certificate; transport documents; lot identification; and, for processors, information demonstrating internal traceability.
8. Subcontracting Agreements	Certificate of the supplier
9. Appointment of ICS Manager & Internal Inspectors	Formal appointment records showing who has been assigned the ICS Manager and Internal Inspector roles. The slides list these appointments as compulsory ICS records.

Internal (ICS) Inspections

The ICS must inspect **100% of members every year**. The date of each internal inspection must also be recorded in the member list. The ICS should use a risk-based approach. Inspections should take place at different times during the production season so that different risks can be checked



Internal inspection is not only a paperwork exercise. It must verify what is happening on the farm and identify risks throughout the production season.

Categories of Non-Compliances

The new EU system groups non-compliances into three categories:

Category	Meaning
Minor Non-Compliance	Lower-level non-compliance requiring corrective action
Major Non-Compliance	Serious non-compliance requiring stronger measures
Critical Non-Compliance	Very serious non-compliance that may affect organic integrity

When must the ICS Manager notify the Certification Body?

The ICS Manager must immediately notify the CB in cases involving:

- Suspicion of major or critical non-compliance
- Suspension or withdrawal of a member, production unit or premises
- Prohibition of selling specific product lots as organic

Key Message:

Identify → Record → Take action → Follow up → Notify the CB where required

Training and Supporting Farmers

Farmers' training as new EU Requirement

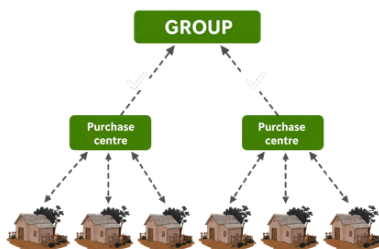
- ICS shall have procedure for “training of GoO members on ICS procedures and the requirements of the EU organic Regulation”
- Training of members shall be “recorded”.



- Good farmers' training & ongoing support in organic production is key! Practical field activities and explanation of production rules with examples in the field always work best!

Traceability & Product Flow Control

The ICS must have documented procedures that allow products to be traced through the joint marketing system, from the individual farmer through production, preparation, storage and sale by the GoO.



Traceability records should cover:

- Joint purchase and distribution of farm inputs
- Delivery of products from each member
- GoO production records
- Storage records — products in and out
- Preparation records
- Sales of products by the GoO
- Yield estimates and cross-checking of member deliveries against those estimates

Lot identification

- A consistent lot identification system should follow the product from the point of purchase, through preparation and storage, up to final sale. This is particularly important when non-compliance occurs because the affected product must be identifiable and traceable

At every stage, the ICS must be able to identify where the product came from, where it went and how much moved through the system.

Key Rules: Preparation/Processing by Members

GoO members may handle, process and store organic crops before selling them through the group's joint marketing system. These activities must be controlled by the ICS.



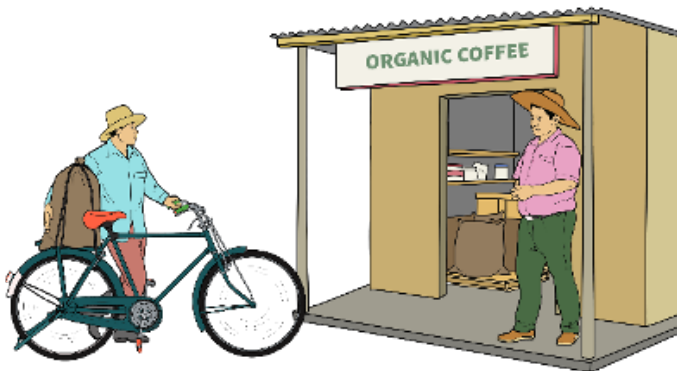
MEMBERS MUST TAKE PRECAUTIONS TO AVOID:

- Mixing organic products with non-organic or in-conversion products
- Contamination during on-farm storage
- Contamination during transport to the purchase centre
- Contamination during post-harvest handling

Important rules

- Where a member handles the same crop in different qualities, such as organic and in-conversion, clear separation is required.
- Only authorized substances may be used for pest control in areas where organic products are stored or handled.
- Only specified products may be used for cleaning and disinfection in on-farm production, processing and storage.

Purchase, Transport, Storage & Preparation in the GoO



When farmers deliver products to a GoO purchase centre, the ICS must ensure that the products are correctly received, recorded, stored and handled so that organic integrity is maintained.

At the Purchase Centre

The GoO should:

- Give the farmer a receipt
- Keep a purchase record
- Check the member's certification status
- Compare the quantity delivered with the member's yield estimate
- Record the results of the reception check

Purchase, Transport, Storage & Preparation in the GoO



During Storage & Preparation

Organic products must:

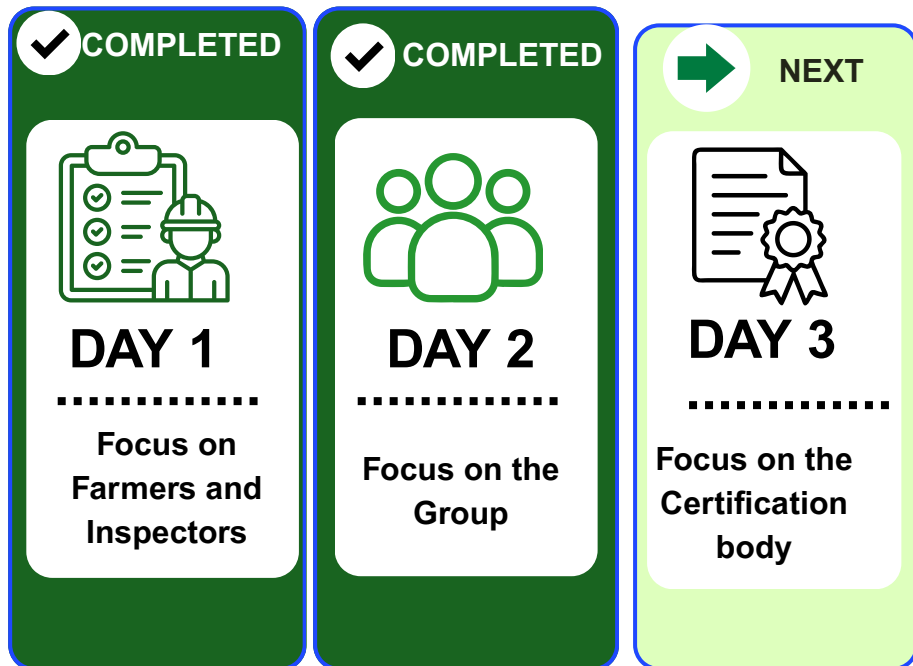
- Be clearly identified at all times
- Be kept separate from in-conversion and non-organic products
- Be protected from contamination and commingling
- Be stored in clean areas and packaging
- Only be exposed to authorized pest-control substances
- Remain traceable during preparation and storage

During Transport

- Where products are moved from purchase centres to a central GoO warehouse, measures must be taken to prevent contamination and mixing with products of a different status.

**CONTINUE THE ICS TRAINING
SERIES**

This booklet is part of a 3-part practical reference series for Internal Control System (ICS) training.



Keep the full series together as a practical reference for group organic certification and Internal Control System implementation.

Publication Information

This knowledge product is part of the ICS Training Set and provides a simplified and practical summary of the key topics covered under Day 2 – Focus on the Group and Internal Control System (ICS). It has been developed with reference to the Training Manual for ICS Managers in view of obtaining EU Organic Certification.

The guide focuses on the practical requirements that Groups of Operators, ICS Managers and ICS Inspectors need to understand and apply. It covers eligibility and organization of Groups of Operators, legal personality, geographic proximity, ICS procedures, roles of the ICS Manager and ICS Inspectors, compulsory documents and records, internal inspections, management of non-compliances, farmer training, traceability, preparation and processing, and product handling, transport and storage.

This knowledge product has been developed by the Tanzania Organic Agriculture Movement (TOAM) with support from the Knowledge Hub for Organic Agriculture and Agroecology in East Africa (KHEA) Project.

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