

ORGANIC PRODUCTION REQUIREMENTS

A Practical Guide for Groups

Practical guidance on what the Certification Body checks, how external inspections are conducted, how non-compliances are handled, what information appears on the organic certificate, and how certification bodies are supervised.



For ICS Manager, ICS
Inspectors and Farmer
Groups



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ABOUT THIS KNOWLEDGE PRODUCT

This knowledge product is part of the ICS Training Set and presents the key learning areas covered on **Day 3** of the ICS training curriculum for EU organic certification.

Day 3 focuses mainly on **the Certification Body (CB), external control and certification of Groups of Operators (GoO)**. It explains what the Certification Body checks, how external inspections are carried out, how non-compliances are handled, what information is included in the organic certificate, and how Certification Bodies themselves are supervised.

Who is this guide for?

- ICS Managers
- ICS Inspectors
- Farmer Groups / Groups of Operators
- Certification and compliance staff
- Extension Officers

Contents

- Understanding external control and certification
- What the Certification Body checks
- Information the GoO must provide
- Methods and techniques used during external control
- Traceability and mass-balance checks
- Inspection reports and management of non-compliances
- Certification decisions and certificate information

How to use this guide

Use it as a quick reference during ICS training, preparation for external certification, internal compliance reviews, inspection preparation, documentation checks and follow-up on certification requirements.

External Control and Certification

DAY 3

The Certification Body uses a risk-based approach to verify compliance with EU organic production and labelling requirements every year.



ICS Functioning

The Certification Body checks whether the ICS is functioning effectively, including ICS records, exchange of information, re-inspections and witness audits.



Organic Production by Farmers

The CB verifies production practices, preventive and precautionary measures, separation of production units and products, and may take samples where necessary.



Product Handling & Traceability

The CB checks post-harvest handling, identification of organic products, separation of organic and non-organic products, traceability and mass balance.



Before External Control: What Must the Group Provide?

Before the Certification Body carries out external control, the Group of Operators must provide the required information and confirmations.

The group must provide:

- Description of the production units
- Measures to ensure compliance
- Precautionary measures
- Confirmation(s) by the group
- Confirmations by the members
- Signed contract / agreement



External inspection starts with proper notification and complete information from the GoO.

External control combines field inspection, document review, interviews, sampling and traceability checks it is not based on one method alone.

How Does the Certification Body Carry Out External Control?

The Certification Body uses different methods and techniques to verify whether the Group of Operators and its ICS comply with organic certification requirements.

The CB may use:

- Map and geo-location checks
- Reviewing maps, cardinal directions and geo-locations of production units and premises.
- Physical inspections
- Checking production units, equipment, means of transport, premises, animals, plants, goods and ingredients.
- Product and handling checks
- Reviewing traceability, labelling and packaging materials.
- Document and record review
- Examining production records and ICS-related documents.
- Interviews
- Speaking with farmers, ICS personnel and other relevant persons.
- Sampling and laboratory analysis
- Taking samples where necessary for testing.
- Mass balance and traceability checks
- Comparing product quantities and records to verify that product flows are consistent and traceable.

EXTERNAL INSPECTION REPORT

At the end of the external inspection, the Certification Body prepares an inspection report documenting what was checked, what was found and any actions required from the Group.



WHAT THE REPORT CONTAINS

- Reference to EU Regulation 2018/848
- Methods and techniques applied
- Inspection results
- Actions to be taken by the Group
- Deadline for completing the required actions

SIGN-OFF & FORMAT

- Signature of the CB Inspector
- Signature of the ICS Manager
- Signature of the farmer, where relevant
- Report may be issued in paper or electronic format

Sampling and Laboratory Analysis

The Certification Body may take samples as part of external control to detect the use of non-authorised substances, non-compliant production techniques, or possible contamination.

Key requirements:

- The CB should take samples from not less than 2% of the number of members
- Sampling is mandatory where there is suspicion of prohibited substances or prohibited techniques
- Samples must be analysed by an accredited laboratory
- Laboratories should be accredited according to ISO/IEC 17025
- For pesticide screening, the analytical methods should cover at least the active substances officially monitored by EU Member States
- Sampling may be delegated to accredited sample takers

Note: Sampling provides additional evidence where compliance cannot be confirmed through inspection and records alone.

Before the Group Can Be Certified

Before issuing certification, the Certification Body must verify that:

- The group complies with the organic production rules
- Products are labelled according to the required labelling rules
- Subcontractors are covered by the control system, whether or not they have their own certification
- If the group changes Certification Body, previously issued certificates remain valid as applicable
- Non-compliances identified during the previous three years have been addressed
- Any required derogations have been granted or processed
- The CB considers whether the group's certificate was withdrawn during the previous two years

Note: Certification is issued only after the CB confirms that the group, its products, past non-compliances and relevant certification history meet the required conditions.

What Information Is Included in the Organic Certificate?

Once the Group of Operators has met the certification requirements, the certificate records the key details of the certified operation.

The certificate includes:

- Certified activity or activities
- Product categories
- Specific products
- Product status (Organic or In-conversion)
- Validity period
- List of members
- Member name and address
- Certified quantities, such as kg, litres or hectares
- List of premises or units
- Information relating to subcontracting
- Other required certification information

The certificate shows exactly who and what is certified, under which activities, product status and period of validity.

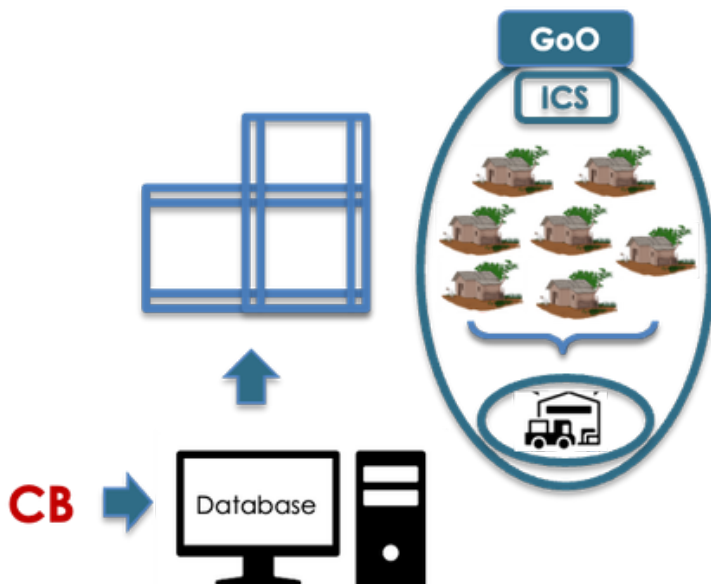
- The list should be updated immediately whenever the certification status changes. If a certificate is withdrawn, the information should remain on the list for 5 years after withdrawal.
- Certification information must remain transparent, current and publicly accessible.



Information Kept in the Certification Database

The database shall contain at least the following information (relevant selection):

- Size of the group
- Name and address of each member
- Status of conversion
- Risk level
- Name and address of subcontractors
- Geographical coordinates and surface area of all production units and premises
- Derogations granted
- Inspection reports
- Lab reports
- Letters of Non-compliances
- Invoices



Conversion Period & Retroactive Recognition

A Certification Body may recognize a previous period as part of the organic conversion period, but only under strict conditions.



What must be provided?

The operator must provide evidence showing that the land was natural or not treated with prohibited substances during the previous 3 years. This may include: **Maps, Geo-location information and Photographs**



What does the Certification Body do?

The CB must:

- Carry out a risk analysis
- Use risk-based sampling
- Conduct a physical on-site inspection
- Prepare an inspection report confirming whether the information provided is consistent

Role of the ICS

The ICS must have documented procedures for:

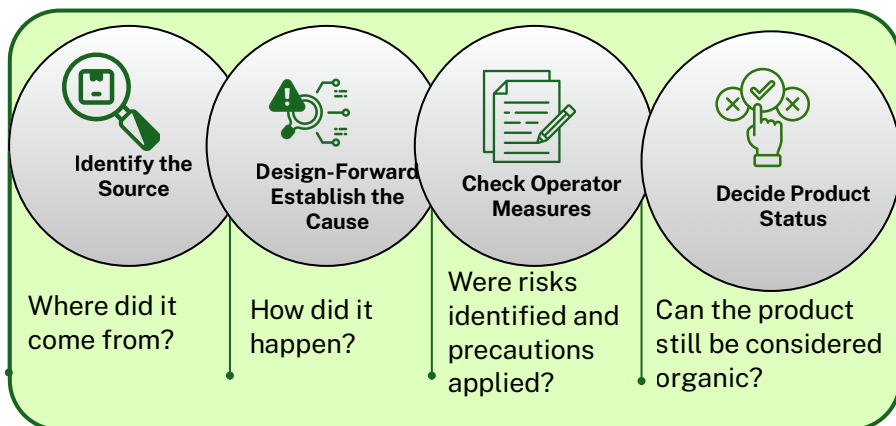
- Registering and approving new members
- Adding new fields or activities for existing members
- Managing conversion

Retroactive recognition is not automatic. It can only be authorized by the Certification Body after documented evidence, risk assessment and on-site verification.

When Prohibited Substances Are Detected

If laboratory results show the presence of prohibited substances, the Certification Body **must investigate before making a final decision**

The investigation should determine the following:



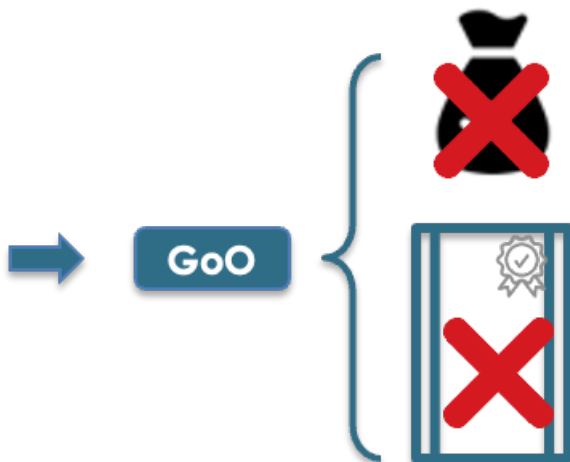
WHAT HAPPENS NEXT?

If the investigation confirms non-compliance, the Certification Body may decide that the affected products cannot be sold as organic.

A positive laboratory result triggers investigation before a final certification decision is made.

What Happens When Non-Compliances Are Identified?

When the Certification Body confirms a non-compliance, it must ensure that the problem is clearly identified, corrected and prevented from happening again.



The Certification Body should ensure that:

- Reference to organic production is removed from affected products
- The origin and extent of the non-compliance are determined
- Other affected lots or fields are checked
- Responsibility of the Group of Operators is established
- The group takes measures to correct the problem
- Measures are introduced to prevent recurrence

If the non-compliance is serious, repetitive or continues over time, the group's certificate may be **Suspended**, or **Withdrawn**

Non-compliance can affect both the organic status of products and, in serious cases, the certification status of the whole group.

External Inspection of a Group of Operators

During external inspection, the Certification Body checks both the ICS system and a sample of individual members to verify that the group is operating according to organic requirements.

The external inspection may include:

- Visit to the GoO ICS office
- Interview with the ICS Manager
- Review of ICS procedures and records
- Check of the member list
- Review of identified non-compliances and corrective measures
- Visit to purchase centres
- Review of traceability records, including deliveries from members and formation of product lots
- Verification of separation and prevention of contamination
- Re-inspection of 5% of members, selected using a risk-based approach
- Full organic farm inspection during member visits
- Cross-checking ICS findings and data
- Where relevant, sampling and witnessing an ICS inspection

Important note: The Certification Body does not only inspect the office it checks records, purchase centres, traceability systems and selected member farms to confirm that the ICS works in practice.

ICS Deficiencies and Their Consequences

The Certification Body may consider the following as serious weaknesses in the Internal Control System:

- Failure to carry out 100% physical internal inspections every year
- Serious differences between internal and external inspection findings
- Failure to apply appropriate measures when non-compliances are identified
- Processing or selling products from suspended or withdrawn members
- Adding new members or production units without following the required procedures
- Having an insufficient number of internal inspectors
- Internal inspectors lacking the required competence

What can happen if the ICS fails?

If weaknesses in the setup or functioning of the ICS affect the integrity of organic or in-conversion products, the Certification Body can withdraw the certificate for the whole Group of Operators. This is particularly serious where the ICS fails to detect or address non-compliance by individual members.

A weak ICS can put the certification of the entire group at risk not only the individual member involved.

POSSIBLE CONSEQUENCE: WITHDRAWAL OF THE GROUP CERTIFICATE

Records Needed for Traceability Checks

Traceability checks verify that organic products can be followed through the supply chain using appropriate supporting documents, including stock and financial records. The records should include:

- Name and address of the supplier
- Where different, name and address of the owner, seller or exporter
- Name and address of the consignee
- Where different, name and address of the buyer or importer
- The supplier's organic certificate
- Required product information under the applicable EU rules
- Appropriate lot identification
- For processors, information that allows internal traceability and confirms the organic status of ingredients

Traceability means being able to follow an organic product from its source through handling, processing and sale using reliable records.

Risk-Based Approach in External Control

- The Certification Body uses a risk-based approach to determine the risk level of the Group of Operators and to plan the intensity of external control.
- The CB considers factors such as:
 - Size of the group
 - Number of new members
 - Complexity of operations
 - Length of time in organic production
 - Results of previous external controls
 - Results from the ICS
- The level of external control is influenced by the risks identified within the group, its operations and its previous compliance history.
- Under EU organic certification, products are grouped into the following categories:



Plants and unprocessed plant products



Live animals and unprocessed livestock products



Aquaculture plants and animals



Processed agricultural products for use as food



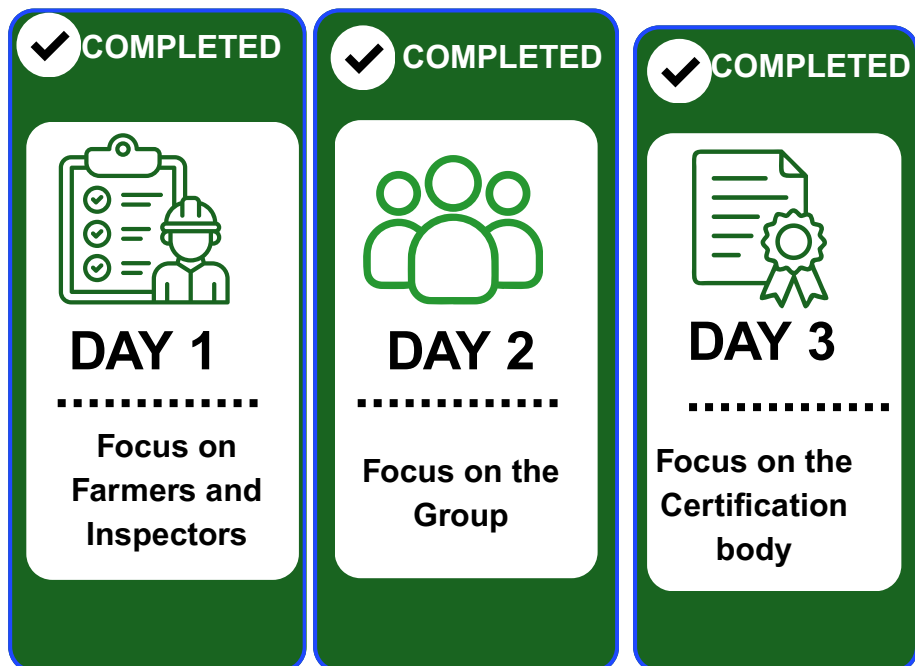
Feed and wine



Products closely related to agriculture that are not covered by the previous categories

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 3 – Focus on the Certification Body, External Control and Certification. It has been developed with reference to the Training Manual for ICS Managers in view of obtaining EU Organic Certification.

The guide focuses on what Groups of Operators, ICS Managers and ICS Inspectors need to understand when preparing for and undergoing external certification. It covers the role of the Certification Body, external inspection methods, information required before inspection, inspection reports, sampling and laboratory analysis, certification decisions, certificate information, management of prohibited substances and non-compliances, implications of ICS deficiencies, risk-based control, traceability and mass-balance checks, stock and financial records, and product categories under EU organic certification.

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.

Developed by Tanzania Organic Agriculture Movement (TOAM) with support from the KHEA Project and referenced from the ICS Training Curriculum for EU Organic Certification.

