April 25, 2007

Mike Johanns, Secretary
United States Department of Agriculture
1400 Independence Avenue SW
Room 200A
Washington, DC 20250

Secretary Johanns:

The National Organic Coalition and the additional undersigned concerned organizations and individuals, wish to bring to your urgent attention our strong concerns regarding a recent announcement of the National Organic Program (NOP) policy regarding the potential for organic certification of Grower Groups (GGC).

At the outset, we would like to commend the NOP on taking necessary steps towards enforcement of USDA standards throughout the world in order to ensure the integrity of the organic label worldwide. However, we have concerns that a recent decision pertaining to an individual entity announces a fundamental shift of policy at USDA/NOP regarding the inspections and certification of Grower Groups.

Historically, certification agents have widely and successfully implemented GGCs for over a decade, as a method of providing access to the organic market for farmers from developing countries who have very limited financial resources. Products successfully certified organic under the GGC system include nearly all of the organic coffee and much of cocoa, teas, bananas, spices, as well as many other products. The retail market value of coffee alone is estimated to be between $200-300 million USD. Chocolate and sugar together are conservatively estimated to be similar, with a combined estimated retail value of coffee, chocolate, and sugar equaling $400 – 600 million USD.

The GGC system was designed and created before the existence of USDA National Organic Program and it is practiced under many international certification programs. GGC systems are recognized around the world in world-wide markets. Since 2002, the NOP has accredited organic certification agencies, many of whom certify grower groups. The NOP has accredited these agencies with full knowledge and approval of the GGC systems. The National Organic Standards Board proposed a guidance policy to address this issue in 2002, and the practice of certifying grower groups has, in fact, continued by USDA-accredited organic certification agencies without further clarification from the NOP since implementation of the USDA regulations in 2002.
The Grower Group Certification model has been utilized for farmers in developing countries who have very limited financial resources and is limited to farmers who have formed associations, cooperatives or other democratically organized groups. To qualify for certification as a Grower Group, the farmers must create an internal certification control system (ICS) which ensures that the entire group, as well as each participating farmer, complies with organic certification requirements. The purpose of this system is to aid those farmers who cannot afford individual certification, thus providing a valid export access for these farmers, often for the very first time. At the same time, the ICS seeks to provide consistent oversight for the group to verify compliance with strict organic standards and therefore preserve consumer confidence. Organic accreditors and certifiers must ensure that these ICS systems are fully functioning.

There appears to be some conflict with this type of practice and the existing NOP regulation, as interpreted by USDA (see USDA/NOP Adverse Action: Denial of certification, Appeal RULING: October 27, 2006). In this case, USDA denied certification of a Mexican operation due to noncompliance issues, and further stated that: “The ruling established that use of an internal inspection system as a proxy for mandatory on-site inspections of each production unit by the certifying agent is not permitted.”

Since this decision could have very significant economic impact on some of the world’s smallest and most vulnerable farmers, affect major US food industry buyers, and deny consumers access to numerous organic products, we urge the USDA to proceed carefully with any policy decisions only after considering alternatives and consulting in thoughtful and timely discussions with the wide range of potentially impacted stakeholders and program participants.

A critical first step toward making significant policy determinations like the USDA’s statement on GGC must include a public and transparent process. Further, the procedures for considering and taking action on such policies should be fully documented using the standard practices related to management of a Quality System for an accreditation agency. Given the fact that NOP does not have a Quality System in place, it is not surprising that problems have frequently arisen when NOP has made or revised policies related to its accreditation system.

We ask that any ruling on the eligibility of Grower Groups be delayed until NOP institutes a full-fledged Quality System consistent with the mandate at 7 CFR 205.509, which requires that the NOP comply with ISO/IEC Guide 61 (now revised and renumbered as ISO 17011, “Conformity Assessment—General Requirements for Accreditation Bodies Accrediting Conformity Assessment Bodies”).

In our view, compliance with this international norm will greatly improve the current method of making changes in accreditation requirements, as §8.2.4. of ISO 17011 requires accreditation bodies to “give due notice of any changes to its requirements for accreditation and take account of views expressed by interested parties before deciding on the precise form and effective date of the changes.” In addition, this international standard for management of accreditation bodies provides detailed and comprehensive requirements on such topics as:

- Acceptable structures of an accreditation body,
- Impartiality and confidentiality
- Accreditation activities
- Documentation of procedures, policies and standards of the accreditation body,
- Methods for developing, revising, and controlling documents,
- Recordkeeping
- Promptly identifying and correcting nonconformities in the accreditation body’s management
- Managing accreditation personnel
- Ensuring that information about the management of the accreditation body is available to the public,
- Assessing applications for accreditation, performing audits, and making accreditation decisions,
- Ensuring continued compliance of accredited certifiers through reassessment and ongoing surveillance, and
- Handling complaints and appeals.

Following the NOP’s consultation with stakeholders, the National Organic Standards Board, and legal counsel, we fully support a very transparent and participatory process to develop further action with regard to GGC. This process should start with the comprehensive evaluation of the NOSB 2002 recommendations. The recommendations will need greater scrutiny and clarification to be widely accepted, but they serve as the appropriate beginning point for discussions. [Please see attached NOP statement and NOSB recommendations.]

Finally, and most urgently, USDA/NOP must ensure continued access to the US market for the current legitimately-certified and accredited GGC organic products in the stream of commerce while this problem is resolved. USDA should, of course proceed to fully audit, provide appropriate oversight and ensure confidence of all USDA accredited certifiers who are certifying fully functional and legitimate GGC systems

We look forward to your immediate response and to the positive resolution of this very timely and urgent matter,

Undersigned,

National Organic Coalition: Steve Etka, Legislative Coordinator
703-519-7772; Steveetka@gmail.com

Rural Advancement Foundation International -- USA
Beyond Pesticides
Center for Food Safety
Equal Exchange
Food & Water Watch,
Maine Organic Farmers and Gardeners Association
Midwest Organic and Sustainable Education Services
National Cooperative Grocers Association
Northeast Organic Farming Association - Interstate Council,
Northeast Organic Farming Association of Connecticut
Northeast Organic Farming Association of Massachusetts
Northeast Organic Farming Association of New Hampshire
Northeast Organic Farming Association of New Jersey
Northeast Organic Farming Association of New York
Northeast Organic Farming Association of Rhode Island
Northeast Organic Farming Association of Vermont
Northeast Organic Dairy Producers Alliance
Union of Concerned Scientists

** Please see below for additional Organizational and Individual Signatures

Cc: Lloyd Day
    Ken Clayton
    Barbara Robinson
    Mark Bradley
ORGANIZATIONAL/BUSINESS SIGN-ONS

492 Cafe
A Common Thread
A World Away
AeroStar Global Logistics
Agnus Dei Lutheran Church
Agora Ministry
Agricultural Missions
AgriSystems International
Agro Eco, The Netherlands
Akeley UMC
Alanheri (Produkten) BV - The Netherlands
Alberts Organics
Alpha Delta Omega
Alter Eco Fair Trade
ALTERNATIVA 3, S.COOP.CL
Alternative Grounds Coffeehouse and Roastery
Amnesty International at The College of New Jersey
Ancient Wisdom Publishing
APOYO Ministry
Appalachian Crafts Farm
ArtFarm
Ashland Food Co-op
ASOBAGRI, Guatemala
ASPROCAFE INGRUMA, Columbia
Atlas Coffee Importers, LLC
Backcountry Coffee Roasters
Bagel Grove
Barnard EcoReps
Be Ready for 2012
Beautiful Savior Lutheran Church
Breecher gelato & gourmet coffee
Belmont United Methodist Church
Berkeley Natural Grocery Company
Berkshire Co-op Market
Bethel University: World Challenge
Big Sun Music
BIO FOODS (PVT) LTD, Sri Lanka
Blossom Grocery
Blue Ridge Outdoors Magazine
Bonnie May's House of Praise
Brattleboro Food Co-op
Browns United Methodist Church
Camano Island Coffee Roasters
Cantitoe Corners Cooperative
Central Co-op's Madison Market
Cayuga Pure Organics
CECO/ASA Ltda., Peru
C-session Conference
Ceskostedni Skolce
CELEBRATION
CFCI, Inc.
Catholic Community Credit Union
Central Co-op
Central de Cooperativas Cafetaleras del Norte,
CECOCAFEN R.L.,
Central Plurana de Cafetaleros - CEPICAFE, Peru
Centro Uruguayo de Technologias Apropiadas, Uruguay
Certified Naturally Grown
Chicago Fair Trade
Christ Lutheran Church
Christ United Methodist Church
Christus Victor Lutheran Church, ELCA
Church & Society Committee
Church of Christ at Dartmouth College
CIRSA S. de S.S., Mexico
COAINE, Bolivia
Coffee Exchange
Coffee Lab International
coffee-tea-etc, LLC.
Comercializadora Mexicana de Productos
Agroecologicos, Mexico
Community Alliance for Global Justice
Community CROPS
Companeros Cafe
CONACADO, INC, Dominican Republic
Concordia College Campus Dems
Conexión Ecologica
Connecticut Field Office--American Friends Service Committee
Conscious Coffees
Co-op America
Cooperativa de Cafe Organico CECOCAFEN, Nicaragua
Cooperativa de Cafe Organico YUCUL, Nicaragua
Cooperative Coffees, Canada
Cooperative Coffees, USA
COOPESANTA ELENA R.L., Costa Rica
Copesanta Elena R.L., Costa Rica
Cornucopia Institute
Covenant Presbyterian Women
Creating your life path
Crierewood United Methodist Church
Cultural Creatives In Action
Cupper's Coffee Co., Inc., Canada
Davis & Co., CPAs, P.C.
Dean's Beans Organic Company
Deer Run Bed & Breakfast
Desert Sun Coffee Roasters, Inc.
Diocesan Council of Catholic Women
Distribuidora Vida y Esperanza S.C, Mexico
Dominican Sisters
Doodads, Inc.
Downtown Community Fellowship
Druid Hills Baptist Church
Earlham Environmental Action Coalition
Earth & State
Earth Sisters of maine
EarthShare Gardens
East to West Gifts
Ecumenical Peace Institute/CALC
Edmonton Small Press Assn., Canada
El Cerrito Natural Grocery Company
Emanuel Lutheran Church, Manchester, CT
Emmanuel Lutheran Church, Livonia, MI
ENGAGE
EnvironGentle
Environmental Action Club of Skidmore College
Environmental Monitoring Group
Equator Coffees & Teas
Ethical Bean Coffee Co, Canada
Ethical Impact, Inc.
Eve Circle
Fair Trade Advocates of KSU
Fair Trade For All LLC
Fair Trade Puget Sound
Fair Trade Student Association, American University
Fair Trade Winds
Fair World Marketplace
Faith Lutheran Church
Faith United Methodist Church
Family Farm Defenders
FAPECAFES, Ecuador
Federacon Indigena Ecologica de Chiapas SSS, Mexico
Ferncliff Camp
Fiddler's Dream Coffeehouse
FINCA TRIUNFO VERDE, SOCIEDAD CIVIL, Mexico
First Central Congregational UCC
First Congregational Church
First Lutheran Church & School
First Parish Church, Concord, MA
First Presbyterian Church, TN
First Presbyterian Church, NY
First Presbyterian Church, Stillwater, OK
First Presbyterian Church, IA
First Presbyterian Church, Lawton, OK
First UMC of Union County
First UMC of West Webster
First Unitarian Universalist Church
First United Methodist Church
First Universalist Church
Flamenco Organic Coffee Co.
Flying Disc Ranch
Food For Thought
Food For Thought
FoodWise Inc
Forgotten Tails
Forward Movement Publications
Fountain of Life Ministries
Fowler Camp and Retreat Center reformed church in America
Friends Circle
Friends of San Jose de Apartado Peace Community
Ireland
FUMCOG Bazaar
Gardens by Laura
George Washington University Students for Fair Trade
Georgetown Solidarity Committee
Georgetown Students for Fair Trade
Gift & Thrift Inc.
GLOBAL BEANS Coffee
Global Connections
Global Gifts
Globus Coffee LLC
Good Foods Market & Cafe
Good Shepherd Lutheran Church
Goodness Greenness
Grassroots International
Green Line Cafe
Green Mountain Coffee Roasters
Green Street monthly meeting
Grounds for Change, Inc.
Haley House, Inc.
Hands Around the World
Hanover Consumer Cooperative
Harvest Co-op Markets
Hayes Valley Neighborhood Parks Group
Haywood County (NC) Peace Fellowship
Healing Innovations
HEAR US Inc
Healthcote Earthing, LLC
Hebrew University Organic Co-op, Israel
Hendersonville Community Co-op
Heritage coffee company
Hilton Presbyterian Church
Hofstra’s Environmental Law Society
Holy Cross International Justice Office
Holy Rosary Social Justice Committee
Holy Trinity Lutheran Church
Hope Lutheran Church
Hosanna Harbors, Inc.
House of Mercy
Indiana Certified Organic, LLC
Indiana’s Green Network, Incorporated
Indigenous Women's Initiatives
Indigenous Women's Network
Institute for Agriculture and Trade Policy
International Labor Rights Fund
interruption*
Ithaca College Feminists
Joe --a fair trade coffee house
JSL, SA de CV, El Salvador
Just Coffee Cooperative
Just Creations
Just Food, NYC
Justice Committee, Congregation of St. Joseph
k.bach design
Kankakee Natural Foods
kenmore united methodist church
KILIMANJARO NATIVE COOPERATIVE UNION(1984) LTD,
Kind Coffee LLC
Krisoker Saar (Farmers’ Voice), Bangladesh
La Chiwinha, Inc., Puerto Rico
La Siembra Co-operative
La Sienbra Co-operative
Lakewood United Methodist Church
Land Management Partners
Larry’s Beans
Level Ground Trading LTD, Canada
Levelground Trading Ltd., Canada
Lifeenergy, Jana Boggs,
Linden Hills Co-op
Living Wage Clothing
Living Waters Community Lutheran Church
Local Harvest
Lookout Lodge, LTD
Lutheran Campus Ministry at Denton
Lutheran World Relief
Make Now Count
Mandala Tearoom & Apothecary
Manos Campesinas, Guatemala
Mayville United Methodist Church
Mennonite Information Center
Messiah Lutheran Church
Michelle Jolivette Productions
Michigan Java LLC
Michigan Organic Food & Farm Alliance (MOFFA)
Middelbury Natural Foods Cooperative
Mississippi Market Natural Foods Co-op

6
Missouri Farmers Union
Moorpark United Methodist Church
Mount Eagle Christian Center
Mount Olivet Lutheran Church
Mugshots Coffeehouse & Cafe
Mugshots Coffeehouse & Cafe
Multinational Exchange for Sustainable Agriculture (MESA)
National Campaign for Sustainable Agriculture, Organic Committee
National Cooperative Business Association
National Family Farm Coalition
Nature's International Certification Services
natures manna
Nebraska Green Party
Neighborhood Co-op
Network for Business Innovation and Sustainability
New Garden Community Church
New Silk Road Marketing, LLC
NH World Fellowship Center
Northern Plains Sustainable Agriculture Society
Nottingham United Methodist Church
NYC Fair Trade Coalition
Oberlin Student Cooperative Association
OCIA International Inc
Oké USA
One World Artisans
One World Handcrafts
Open Harvest Cooperative Grocery
Organic Agsystems Consulting
Organic Consumers Association
Organic Independents
Organic Islands Promotions Ltd., Canada
Organic Produce Wholesalers Coalition
ORGANIC PRODUCTS TRADING CO
OrganicUniverse.com
Our Saviour's Lutheran Church
Oxfam America
Palms Westminster Presbyterian Church
Paradise United Methodist Church
Pathway Investments, LLC
Pax Christi Springfield
Pax Christi Western New York
Peace and Justice Committee, Sacred Heart Catholic Church, Oberlin
Peace Coffee
Peace Presbyterian Church
Peace with Justice Ministries, Nebraska Conference, UMC
Peacemaking & social justice committee, westminster presbyterian
Peak to Plains Alliance
People's Health Movement USA
Peoples United Methodist Church
Planet Bean Coffee
Plans and Solutions, Inc.
Plowshare Center
Polymeadows Farm
Poolesville Presbyterian Church
Port City Java, Inc.
Presbyterian Mo-Ranch Conference Center
Presbyterians For Restoring Creation
Presbytery of Middle Tennessee Hunger Program
Prescott United Methodist Church
Princess Valiant Coffee
Professional Creations, LLC
Progressive Asset Management
Provender Alliance
Putney Consumers Cooperative
Rainbow Place
Rayjen Coffee Company
Resurrection Lutheran Church
Richland First Presbyterian Church
Rico Latte, Inc
Rising Hope UMC
Rockport United Methodist Church
Root Capital
Roots Market
Roots Market
Rougemont United Methodist Women
Royal Blue Organics / Cafe Mam
Run for Africa
S&S Center for Sustainable Agriculture
Saint Isidore's Catholic Church
San Francisco Urban Service Project
Say It Records
selema whole foods co-op
Sequoiah United Methodist Women
Seven Bridges Cooperative
Seventh Generation Energy Systems
Seward Co-op
Shared Interest Society, UK
Shepherd of the Mountains ELCA
Sisters of Charity of St. Augustine Leadership Team
Sisters of St. Francis
SmartSprocket, inc.
Smith Mill Creek Institute
Social Concerns Committee of Sisters of Charity of St. Augustine
Social Justice Alliance
Social Ministry Committee, Grace Lutheran Church Society
Sojourns
Solor Lutheran Church
Somos CaPAZes, Colombia
Sources of Hope Gifts & Books
South Africa, UKZN, Farmer Support Group, South Africa
Spirit of Joy Lutheran Church
St John's United Church of Christ
St. Andrew's Social Justice Committee
St. Hubert Peace and Justice Committee
St. John's Evangelical Lutheran Church
St. Joseph Community Health
St. Mark's Lutheran Church
St. Mary's JPIC
St. Matthew Trinity Lutheran Church Board of Outreach
St. Matthew's United Methodist Church
St. Paul's Lutheran Church
St. Peter Lutheran Church ELCA
St. Zephyrin Church
State College Presbyterian Church
Sterling United Presbyterian Church
Students for Fair Trade
Sunny Side Presbyterian Church
Sustain/FamilyFarmed.org
Sweet Onion Food Co-op
Sweetwater Organic Coffee Co. Inc.
Sychar Lutheran Church
synAIRgis, Canada
Tanzania
Tatum Ventures
Tea Howc
Tea Promoters (India) Private Limited, India
Ten Thousand Villages - Asheville
Ten Thousand Villages - Ephrata
Ten Thousand Villages Charlotte
Ten Thousand Villages Grayslake
Ten Thousand Villages Hagerstown MD
Ten Thousand Villages Houston, Inc.
Ten Thousand Villages in Evanston
Ten thousand Villages Mishawaka
Ten Thousand Villages Oak Park
Ten Thousand Villages of Akron PA
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Ten Thousand Villages of Fort Wayne IN
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Ten Thousand Villages of Huron Valley
Ten Thousand Villages of Kansas City Inc
Ten Thousand Villages of Kearney NE
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Ten Thousand Villages of Richmond VA
Ten Thousand Villages of Sioux Falls SD
Ten Thousand Villages of Souderton PA
Ten Thousand Villages, Pasadena
The Brandermill Church
The Bridge
THE CHANGE strategy and design
The Coffee Review
The Democracy Center
The Dessert Plate
The Earthward Project
The Ecology Club
the Fiberactive Quilt Company
The Food Project
The Green Chef Deli, Inc
The Kobos Company
The Nesting Grounds Coffee House
The Peace With Justice Project
The Porters & Importers Company
The United Methodist Church
The Work of Our Hands
The World's Window
Tierra Nueva
Tradewater / Lower Green Rivers Watershed Watch
Transfiguration Lutheran Church
Trappe Landing Farm & Native Sanctuary
TRIBAL GROUNDS Coffee Culture
Trinity Lutheran Church, Chicago, IL
Trinity Lutheran Church, Wauseon, OH
Trinity Lutheran Church High School Youth
Trinity United Methodist Church, Albion, IN
Trinity United Methodist Church, Grand Island, NE
True Roots
UCC Women's Fellowship
UCIRI, Mexico
Uganda Agroforestry Development Network, Uganda
Uganda Wildlife Authority, Uganda
UMKC National Lawyers Guild
Union de comunidades indigenas de la region del istmo
UNION DE SOCIEDADES DE LA SELVA, SSS
Unitarian Fellowship of Bennington, Vt.
Unitarian Fellowship of Sarnia & Port Huron
Unitarian Universalist Congregation of Venice, Flori da
Unitarian Universalist Fellowship of Bellport
Unitarian Universalist Fellowship of Boca Raton
United Church of Broomfield
United Church of Christ in Abington
United Church of Christ Justice and Witness Ministries
United Methodist Women
United Methodist Women First U.M.C.
United Parish of Upton
United Presbyterian Church of Sterling
Unity Temple
Universidad Nacional Agraria La Molina, Lima, Peru
Untours
Upper Valley Food Co-op
UU Church of Boulder
Veritable Vegetable
Vermont Artisan Coffee & Tea
Veterans for Peace, Oberlin
VillageWorks, Inc.
Viroqua Food Coop
Wagner Bros. Apple Orchard
Wagner Bros. Apple Orchard
Walnut Creek United Methodist Church
Washington DC Fair Trade Coalition
Washington Lutheran Church
Weavers Way Cooperative Association
Wedge Community Cooperative
Wedge Coop
Westover Hills Presbyterian Church
What in the World
Whitecliff Vineyard
White Dog Cafe
White Dog Cafe Foundation
Whole Foods Community Co-op, Inc.
Whole Foods Cooperative
Williamsburg Unitarian Universalists Church
Wilson Memorial High School's Chapter of the National
Honors
Winona United Methodist Church
Women in Black-Evanston
Women of Hope Lutheran Church
Women of the ELCA NWL Synod of MI
Women's Intl' League for Peace & Freedom, Mary Wood
branch,
World Craft & Cafe, Inc. T/A Pangea
World Wildlife Fund
Worldly Goods
York United Methodist Church
Your Words' Worth
Ypsilant Food Cooperative
Zeitgeist Gallery
### INDIVIDUAL SIGN-ONS

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<td>Benjamin Barnett</td>
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<td>Rachel Teadora Barnett</td>
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<td>Dick &amp; Mary Ashbrook</td>
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<td>David Askuvich</td>
<td>Robin Barr</td>
<td>Gordon Benzer</td>
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<td>Elke Aspiller</td>
<td>Samantha Barron</td>
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<td>Dwight Aspinwall</td>
<td>Anna and Doug Barsotti</td>
<td>Valerie Berg</td>
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<td>donny allen</td>
<td>Craig Auchtner</td>
<td>Martha Barton-Rivera</td>
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<td>Iisl auf der Heide</td>
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<td>Connie Beroza</td>
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<td>Karl and Evelyn Bartsch</td>
<td>donald berry</td>
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The Rev. Susan Williamson
David Wilsey
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Scott Wolverton
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John Wong
Stephen Wood
Pamela Wood, farm
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Carolyn Woodbury
Joe Woodcock
Ron Woodcock
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Joan Zimmerman
Tiferet Zimmern-Kahan
Harry Zitzler
Ariel Zodiates
Phyllis Zoon
Alesandra Zsiba
Jess Zurbuch
RECENT DECISION BY USDA/ National Organic Program:  

“6. Improper inspection procedures  
Proposed Adverse Action: Denial of certification  
SUMMARY: A denial of certification was issued to community grower group, located in Mexico, for improper personnel structure of the Internal Control System (ICS) and lapses in its administration. Specifically, the ICS failed to detect the application of a prohibited insecticide by one producer and to provide evidence that the use of empty fertilizer bags for crop storage was confined to one producer. The appellant admitted fault, but contested that the severity of the sanction was disproportionate to the frequency and extent of the non-compliances.

RULING: October 27, 2006. The appeal was denied. The Findings demonstrated that the operation's oversight mechanisms for maintaining compliance were inadequate. Further, the certifying agent's policies and procedures for the certification of community grower groups were deemed inconsistent with the NOP and had been implemented prematurely prior to evaluation by the NOP In conflict with the provision §205.403(a)(1), whereby each production unit must be inspected, the agent selected a percentage of the producers within a community grower group for on-site inspection. The internal inspection procedures, whereby each production unit is inspected, was overseen by members of the grower group who were not required to have sufficient expertise, be subject to an annual performance review or to disclose conflicts of interest.

The ruling established that use of an internal inspection system as a proxy for mandatory on-site inspections of each production unit by the certifying agent is not permitted. The appellant waived the right to a hearing, and the denial of certification was final.”
Criteria for Certification of Grower Groups

Introduction:

Grower group certification refers to the certification of a group of producers whose farms are uniform in most ways, and who are organized under one management and marketing system. Grower group certifications have historically been used for the certification of cooperatives or groups of producers located in a geographical or social region, whose crops are marketed collectively. Primary crops produced by grower groups include coffee, cocoa, tea, spices, and tropical fruits.

Background:

In section 205.2, the final rule defines “person” as “an individual, partnership, corporation, association, cooperative, or other entity.”

In section 205.400 “General requirements for certification,” the final rule states: “A person seeking to receive or maintain organic certification under the regulations in this part must:
(a) Comply with the Act and applicable organic production and handling regulations of this part;
(b) Establish, implement, and update annually an organic production or handling system plan that is submitted to an accredited certifying agent as provided for in § 205.200;
(c) Permit on-site inspections with complete access to the production or handling operation, including noncertified production and handling areas, structures, and offices by the certifying agent as provided for in § 205.403;
(d) Maintain all records applicable to the organic operation for not less than 5 years beyond their creation and allow authorized representatives of the Secretary, the applicable State organic program’s governing State official, and the certifying agent access to such records during normal business hours for review and copying to determine compliance with the Act and the regulations in this part, as provided for in § 205.104;
(e) Submit the applicable fees charged by the certifying agent; and
(f) Immediately notify the certifying agent concerning any:
(1) Application, including drift, of a prohibited substance to any field, production unit, site, facility, livestock, or product that is part of an operation; and
(2) Change in a certified operation or any portion of a certified operation that may affect its compliance with the Act and the regulations in this part.”

Given the fact that the rule includes “cooperative” and “association” in the definition of “person”, and given the fact that section 205.400 indicates that it is a “person” who seeks organic certification, it can be concluded that grower groups, organized as cooperatives or associations, can seek certification as one operation under the NOP without a change to the rule.
Grower groups are different from other entities seeking certification in that they are comprised of numerous producers who are certified as one entity, rather than being certified as individual sole proprietors.

Historically, not all grower group members’ farms are individually inspected by the certifying agent annually. This means that the grower group must have a quality system, or internal control system, in place to assure that all members of the group operate according to the system plan in compliance with the organic standard. The quality system of the grower group is inspected at least annually, but only a set percentage of the member operations are visited by the certifying agent. Individual site inspections are conducted primarily to validate the functioning of the quality system.

**Rationale:**

Many products sold as organic in the United States, including coffee, cocoa, tea, spices, and tropical fruits, are produced by grower groups. These types of operations are certified by certifying agents who have received NOP accreditation. While there is no need to change to the final rule, there is a need to provide guidance to the NOP to assure that certifying agents who operate grower group certification programs follow consistent procedures. There is also a need to assure that such certifying agents are evaluated according to set criteria during the accreditation review of their programs.

**Recommendation #1:**

**Criteria for the Certification of Grower Groups**

The NOSB recommends that, in order to be certified as a grower group, the following conditions must be met:

- The crops and farming practices of the producers must be uniform and reflect a consistent process or methodology, using the same inputs.
- The group must be managed as a legal entity under one central administration that is uniform and consistent.
- Participation in the group is limited to producers who sell all of their organic production through the group.
- Producers who are certified as part of a grower group do not possess individual certificates. Rather, the grower group is certified as a unit.
- Grower groups must establish and implement an internal control system (quality system), with supervision and documentation of production practices and inputs used at each producer’s operation to insure compliance with the USDA’s National Organic Standard.
- Grower groups must ensure 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.
The certifying agent shall have policies and procedures for determining how many growers must receive an annual inspection by the certifying agent. For each grower group it certifies, a certifying agent must document its method for determining the number of growers to be inspected. This determination must include consideration of:

- The number of operations participating in the grower group;
- The size of the average operation in the grower group;
- The degree of uniformity between the group’s operations;
- The complexity of the group’s production system(s); and
- The management structure of the group’s internal control system.

Recommendation #2:

The NOSB recommends that the following information be included in the NOP Accreditation Manual:

A. Inspection of Grower Groups

**Information provided.** The first step of any grower group inspection is to review the material from the certifying agent to determine the scope of the project. Grower groups are often very complex. They may include hundreds if not thousands of producers. These types of operations do not easily fit normal inspection protocols. Therefore, much supplemental data is necessary in addition to normal certification documents. The following is a list of information that the certifying agent must provide to the inspector prior to the inspection:

- General map indicating the general region of the production zone.
- A more detailed map indicating the location of each of the communities to be inspected.
- Grower lists by community, listing producers, producer codes or numbers, amount of land area under production by each producer, crops, estimated yields, and past production history. Many grower groups maintain individual producer records such as parcel maps and grower agreements which are generally reviewed at the time of inspection.
- Organic system plan, certification questionnaire, or application.
- Name of contact persons with phone numbers, both home and work. It is important to have access to at least two contacts in case the primary contact person cannot be reached.
- A description of the project to understand how it is organized. A previous inspection report should be provided for certification updates.
- Handling plans, questionnaires/applications, if there is any processing. (Many grower groups operate processing and/or storage facilities.)
- Information on final sales and distribution. This is important to determine if any off-site export or storage facilities need to be inspected.
- In the case of certification updates, the inspector should be provided with the past certification letter with all conditions for certification clearly stated. As indicated, the past inspection report can be extremely valuable, and should be reviewed.

**Review internal control documents.** Upon arrival at the inspection locale, meet with the management to plan the inspection itinerary. You should clearly understand the organizational
management of the project prior to heading out into the field. You will need documentation of the internal control system to properly verify local oversight efforts, education programs, product flow, and production practices. It is advisable to review internal control documents and other records before heading out into the field. This information can help you choose where to focus your inspection site visits.

**Select the sites to visit.** Make sure that you have the freedom to select any part of the project for inspection. Do not allow the grower group manager to “direct” the inspection. Keep in mind that the further a group of producers are from the main office or the internal control system administrator, the weaker the control may be. Attempt to visit remote producers to best assess the system.

**Interview grower group members.** Once the inspection begins, it is best to follow the product flow starting with the production sites, followed by primary processing, final processing, packaging, storage, and distribution. When visiting the producers, in addition to observing production practices and organic control points specific to the operation, the inspector must verify aspects critical to the overall project. Interview producers directly. Ask questions not only about their farms, but also about other project programs. How well does the producer understand what organic farming and certification means?

**Ask direct questions.** It is also important to ask producers, point blank, “When was the last time you used agro-chemicals?” You may want to ask specifically if this includes urea or Roundup or other brand name products common to the area. Often producers in a remote area do not clearly understand that these substances are prohibited. Do not assume anything. Individual farm integrity usually reflects the producer's understanding of organic certification, which is directly linked to the project's educational and oversight efforts.

**Understand local issues.** It is critical to understand the local culture, traditions, and common inputs. It is advantageous to invite a local inspector to accompany you. A local inspector can help build trust with producers and help you understand local issues. Such cooperative arrangements can help empower indigenous inspectors.

**Office audit.** Once all aspects of the project have been inspected, a final visit to the project office will likely be required for an audit. The audit of the entire project is best done at the end of the inspection, when the inspector has a more thorough understanding of the entire operation. Additionally, it will most likely be necessary to verify different pieces of information gathered during the field inspection.

**Exit interview.** An exit interview with the project management is necessary in order to answer remaining questions. This gives the inspector a last chance to secure missing information, obtain required signatures, clarifying confusing, inconsistent, or inaccurate information, and communicate issues of concern.

**B. The Internal Control System and Organic Control Points (OCPs)**

**Assess the internal control system.** The most critical component of both the grower group
inspection and the grower group inspection report is the assessment of the internal control system. (A grower group inspection is in fact an evaluation of the internal control system.) The report must address the steps taken by the internal control system to enforce compliance with organic standards.

- Have the operators been provided copies of the standards in a language or format they understand?
- Does the internal control system use individual inspection reports to assess operator compliance?
  If not, how is compliance assessment documented?
- How often do official representatives of the control system visit each operation?
- What kinds of documents are generated to verify these visits?
- Are new operators inspected prior to being added to the GG?
- Have all grower group members signed a contract stating that they will comply with the organic standards and permit annual inspections?
- Are operators provided assistance to comply with the standards?
- What happens when non-compliance is suspected or detected?
- Are there records of the actions taken when non-compliance has been investigated?
- Does the control system have an official "sanctions" policy? If so, submit a copy with your report.

**Report inconsistencies.** It is important to clearly describe the consistency of the project from producer to producer. As indicated, different certifying agents may have different requirements for grower group inspections. Some may require spreadsheets with information on each producer; others may require site visit sheets signed by the farmer at the farm; others require inspecting only a percentage of the total number of producers. If you find prohibited practices and you are only inspecting 20% of the operations, it is a good bet that you have only found 1/5 of the problems. Removal of the individual producer is not necessarily the final answer. The situation may be an indication that the project is not providing proper oversight. Internal records should match your findings and the findings of the certification program. Present your findings in the inspection report, along with any inconsistencies and unresolved issues.

**OCPs.** It is very important to describe the organic control points of the overall operation, where loss of organic integrity may occur. The inspector should report the preventative steps taken to protect organic products, and identify deficiencies where organic control points are not sufficiently addressed.

The following is a list of examples of organic control points encountered during grower group inspections:

- Unclear registers of grower group members.
- Unclear or inadequate maps.
- Inclusion of new fields or new producers with no conversion or documentation.
- Use of synthetic fertilizers - A producer may think that because he or she uses no herbicides or pesticides, the operation is organic.
- Use of used agrochemical bags or containers for harvested products.
• Contamination during storage or transport, e.g.: boats with gas and water in bilge, or storage under the house with gas and paint on top of product.
• Insufficient buffers or non-separation from other crops that have chemicals e.g.: cacao inter-planted with plantain, with urea used to fertilize the plantain.
• Inclusion of crops from neighbors or relatives who are not on the producer list.
• Intentional chemical use. "I only used a little bit."
• Shared use of backpack sprayers which are also used for applying prohibited materials.
• Unclear internal purchase and transaction records within the grower group.

**Processing by grower groups.** Finally, grower group reports may include process inspection reports for all of the processes performed by the grower group. Make sure that the grower group has submitted a handling system plan, as applicable, and that the plan has been approved by the certifying agent. Follow handling inspection protocols and submit a handling inspection report.

**C. Grower Group Inspection Report Guide**

The grower group inspection report basically follows the outline for a farm inspection report. However, sections may need to be expanded, added, or modified. For example, a section on Organizational Management is helpful to describe many aspects of the project. This section should describe the structure and assess the functioning of the internal control system. It should also list the names of communities, number of producers in each, hectares of each, and, if possible, estimated yields, with totals.

The following outline summarizes the general areas of grower groups that should always be inspected, and provides a list of the additional topics which must be covered in a grower group inspection report:

1. **Background**
2. Project headquarters and audit trail information; organization, accessibility, and accuracy of information; projected yields of products requested for certification
3. Organization management, internal control system, and compliance mechanisms, including records maintained
4. List of communities
5. Grower lists
6. All processing facilities, both on-farm and off-farm
7. Transportation systems
8. Storage facilities
9. Field conditions; inspector observations
10. Risk assessment; adjoining land uses; other organic control points
11. Inputs used
12. Equipment used
13. Packaging materials
14. Producer interviews; inspector observations
15. Education program – producer understanding of organic principles and standards
16. Split operations - production of non-organic crops/products by grower group
D. Outline for Organization and Assessment of the Internal Control System (ICS)

1. Field officers
Field officers are employed by the grower group. They have mixed roles:
   a. Information/extension
   b. Registration of growers
   c. Internal control
   d. On-farm research
Field officers often become part of the community. Because field officers have internal control and education functions, they may have conflict of interest issues. This can be solved by rotation of field officers or field officers from other areas handling the internal control function. There should be a minimum of one field officer per maximum 500 farmers.

2. Principles of ICS
   a. analyses/description of situation
   b. appropriate, documented system
   c. awareness raising, information and instruction, contracting, verbal and written, social controls,
      monitoring, corrective actions, risk analyses

3. ICS documents
   a. Project description
      1. Basic project outline
      2. Farmer and farm profile, grower lists, site maps
      3. Farming practices
      4. Farmer support system
      5. Stakeholder analyses
      6. Risk-assessment
   b. The ICS itself
      1. ICS personnel and the ICS office
      2. Documentation & record keeping (forms)
      3. Monitoring and corrective actions
      4. The buying system arrangement
      5. Product storage and handling procedures
      6. Code numbering and product tracing
   c. Updating the system (annual report)
      1. Compliance with standards
      2. Corrective actions undertaken
      3. Farm/project economy – financial report
4. Update of documents

E. Evaluation of the Internal Control System (ICS)

The outline below contains further methodology for evaluation of the ICS by the third party inspector:

a. At the ICS office
   1. Review of the documented system (Is it sufficient for the current situation?)
   2. File check to see whether system is being adhered to (Is office, are documents, is staff, is the system functioning?)
   3. Review cases of farmer non-compliance
   4. Identification of problem areas/risk assessment
   5. Construct a plan for field visits:
      • Select some to get a general feeling, at random
      • Select some targeted at problems/risk areas and distant production sites
   This work can be done in one day if the office and staff are well organized. The inspector should use a format/checklist/reporting form for this office work.

b. In the field
   1. Field visits
      • Conduct some farm re-inspection visits
      • Inspect some at random (can even be demonstration farm or village elders)
      • Inspect some focused on the problem/risk areas
      • Meet with community, second parties
      • Evaluate social control mechanisms
      • Meet with third parties
   As soon as a non-compliance is detected, the inspector will want to determine whether the non-compliance is the odd exception or whether it is widespread.

c. Back in ICS office (exit interview)
   1. Share evaluation of the field visits with field staff.
   2. Identify OCPs and potential non-compliance issues.
   3. Discuss strategies to address areas of non-compliance with management and field staff.