| OPGP 1: Producer Group Certification – General Criteria | USDA Organic Regulation §205.201  Regulation (EU) 2018/848 Art. 36 |
| --- | --- |
| **Refer to the applicable organic regulation(s) to develop and describe a compliant producer group and its Internal Control System (ISC).**   * *The USDA organic regulations provide definitions of “producer group operation,” “producer group member” and “producer group production unit” at 7 CFR §205.2; sets forth criteria for the organic system plan at 7 CFR §205.201; additional requirements for certification at 7 CFR §205.400(g); and inspection requirements at 7 CFR §205.403(a)(2).* * *Article 36(1) of Regulation (EU) 2018/848 describes the composition criteria and responsibilities for a group of operators.* | |
| 1. How is the producer group organized as a legal entity? Attach documentation of the legal status of the group.  **Attached** | |
| 1. Does the producer group use centralized processing, distribution, and marketing facilities and systems?   Yes  No. In either case, please describe: | |
| 1. Does the producer group maintain an internal control system (ICS) made of a documented set of activities and procedures and through which an identified person or body verifies compliance with the established organic system plan and organic regulations?  Yes  No | |
| 1. How does the group ensure that all agricultural products (to be) sold, labeled, or represented as organic are produced only by producer group members using land and facilities within the certified operation? | |
| 1. How does the group ensure that members do not sell, label, or represent their agricultural products as organic outside of the group unless they maintain individual organic certification? | |
| 1. How are shared resources, including production practices and inputs, procured and provided to all producer group members and personnel? | |
| 1. Do all producer group members follow the farming practices, procedures, and use only the inputs as described in the organic system plan?  Yes  No   If no, please explain. | |
| 1. Is the producer group prepared to immediately notify QCS of any changes in their certified operation that may affect compliance with the applicable organic regulations, including any confirmed or suspected application of a prohibited (non-authorized) substance to any field, crop, or product?  Yes  No   Describe your procedure for notifying QCS of these changes. | |
| 1. Has an Organic Handler/Processor Plan application been submitted for each associated unit that processes or handles products from producer group members?  Yes  No  N/A – product is sold prior to processing/handling | |

| [OPGP](#_top) 2: Internal Control System (ICS) | | USDA Organic Regulation §205.400  Regulation (EU) 2018/848 Art. 36 |
| --- | --- | --- |
| **A. Internal Control System (ICS) Personnel**   1. List all Internal Control System (ICS) personnel names, titles/roles, and responsibilities. Make additional copies as necessary. Attach documentation defining the organizational structure of all personnel and the qualifications for each person authorized to conduct compliance site visits/inspections of producer group members and production units.  **Attachment** | | |
| **Name** | **Job Title (Position).** Check box if the person is authorized to conduct on-site control visits/inspections of producer group member. If checked, attach qualifications. | **List all responsibilities within the ICS or describe in a separate attachment** |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |
| 1. Submit a copy of the Internal Control System (ICS) manual or equivalent documents related to procedures for management of Internal Control System (ICS) personnel, including the following:  |  | | --- | | Measures in place to protect against potential conflicts of interest. Include how the ICS staff declare conflict of interest each year, a copy of the conflict of interest statement, and how it is verified by ICS management.  Measures to protect ICS personnel from retribution, for example, for detecting and reporting noncompliances of the members or the group.  Procedures for the initial and annual assessment of competences and qualifications of all ICS personnel, including inspectors.  Description of annual training for all ICS inspectors and how individual knowledge gained is assessed. | | | |
| **B. Internal Control System (ICS) Management of Group Members**   1. What criteria are used to define the geographic proximity of producer group members and production units, and how do they ensure adequate oversight by the Internal Control System? (e.g., maximum distance or travel time) | | |
| 1. Does the Internal Control System conduct an on-site inspection of each member, parcel (sub-unit), and collection center to verify adherence to the Organic System Plan and applicable organic standard(s)?  Yes  No 2. Submit a copy of the Internal Control System (ICS) manual or equivalent documents related to management of the members of the group, including all of the following:  |  | | --- | | Procedure for approving new members and production units and, where applicable, new activities of existing members on the basis of the internal inspection report.  Procedure for maintaining the membership list.  Description of training, education, and technical assistance provided to group members to ensure they understand ICS procedures, their responsibilities for implementing the organic system plan, and requirements of the organic regulation(s).  Procedures for conducting internal inspections, including an annual on-site inspection of each member with the member present, and any additional risk-based inspections, conducted by the ICS inspectors listed above. Include how inspections verify:   * Compliance to the applicable regulations * Adherence to the group’s organic system plan * Mass balance audits * Reconciliation of each member’s and parcel’s yield and group sales   Forms used to document on-site inspections and the activities verified through inspection.  Description of any monitoring, surveillance or auditing (in addition to annual on-site inspections) used to assess the compliance of producer group members with the organic regulations and adherence to this organic system plan, including extra oversight of high-risk members and production units.  Description of measures taken when noncompliances are detected during internal inspections or other surveillance activities, including their follow-up. Include a list of noncompliances that would result in removal from the group.  Description of the criteria for determining risk (including high risk) of members and production units of the producer group, including the characteristics that indicate the risk determination. |  1. How do you verify that new fields, including fields managed by new members, have not been previously decertified by other producer groups or certification bodies? | | |
| 1. How does the ICS monitor the activities of producer group members to prevent organic fraud? | | |
| 1. **Internal Control System – Documents and Records** 2. Submit a copy of the Internal Control System (ICS) manual or equivalent documents related to procedures for management of Internal Control System (ICS) personnel, including the following:  |  | | --- | | Description of how the ICS controls documents and records  Description of the record-keeping system used by the ICS and members to demonstrate implementation of the organic system plan and compliance with the organic regulations. Indicate who is responsible for maintaining each type of record.  Description of the procedure to ensure the traceability of the production of each member, production unit, and collection center of the group through handling to sale, including sales and transport.  Any other applicable ICS documents or procedures. Specify: | | | |

| **OPGP 3: Members and Production Units** | USDA Organic Regulation §205.202 & §205.203(b)-(c) |
| --- | --- |
| **A. Member Info**   1. Does the group consist of defined production units (subgroups of producer group members in geographic proximity within a single producer group operation that use shared practices and resources to produce similar agricultural products)?   No, the entire group is a single production unit that uses shared practices and resources to produce similar agricultural products.  Yes, there are multiple production units that are part of the group. If yes, list each separate production units:   |  |  |  | | --- | --- | --- | | **Production Unit Name** | **Geographical Region** | **Organic products produced** | |  |  |  | |  |  |  | |  |  |  | |  |  |  | |  |  |  | | |
| 1. Using the “Production Group” tab of the Excel table *Producer Group Sub-Unit Information*, list all sub-units used for organic production as part of the producer group. Sub-units are the distinct sites operated by producer group members where organic production occurs. If multiple sub-units are operated by the same producer group member, list each location separately. Fill in the details in each column provided, including the member’s name, sub-unit name, location, production unit, agricultural products produced, estimated yields, and size of production areas.  **Attachment** 2. Attach a separate Parcel Description and Land Use Affirmation (OGP3) for each sub-unit listed.  **Attachment** 3. Were any sub-units previously certified as part of a different operation?  Yes  No   If yes, attach the organic certificate for each sub-unit that was previously certified as part of a different operation.  **Attached**   1. Does the producer group use any collection centers to collect or distribute products from multiple members?   Yes  No. If yes, list details on the “Collection Centers” tab of the Excel table *Producer Group Sub-Unit Information.* | |
| **B. Enforcement Activities**  Using the “Enforcement Activities” tab of the Excel table *Producer Group Sub-Unit Information*, summarize all enforcement actions issued by the Internal Control System since the last QCS inspection, including noncompliances, sanctions, and adverse actions. Indicate the outcome of the enforcement action, including whether it is open/uncorrected, corrected, or if the member/sub-unit was removed from the group. Attach documentation of corrective action for each enforcement action.  **Attachment** | |