**1- Purpose:** The purpose of this procedure of group of operators is to ensure to evaluate the effective implementation of the Regulations (EU) 2018/848.

**2.Scope:** To evaluate the effective implementation of the procedure of the group of operators.

**3.Responsibility**

Certification manager, Audit manager , Auditor & Technical reviewer.

**4.Requirements**

A member of a group of operators should register for only one group of operators for a given product.

Where the operator is engaged in different activities related to that product;

* The maximum size of a group of operators shall be 2,000 members.
* The individual certification cost represents more than 2 % of each member’s turnover or standard output of organic production and whose annual turnover of organic production is not more than EUR 25, 000 ( value in approx. INR) or whose standard output of organic production is not more than EUR 15, 000 ( value in approx. INR) per year.
* who have each holding of maximum:
* five hectares
* 0.5 hectares, in the case of greenhouses
* 15 hectares, exclusively in the case of permanent grassland
* Group of operators composed of members whose production activities take place in geographical proximity to each other.
* Set up a joint marketing system for the products produced by the group.
* Establish a system for internal controls comprising a documented set of control activities and procedures in accordance with which an identified person or body is responsible for verifying compliance with Regulation (EU) 2018/848 of each member of the group.

The group of operators should keep the following documents and records for the purposes of the system for internal controls (ICS)

The list of members of the group of operators based on their registration of each member and consisting of the following elements for each member of the group of operators;

* Name and identification (code number)
* Contact details
* Date of registration
* Total land surface under the management of the member and whether it is part of an organic, in-conversion or non-organic production unit.
* Information on each production unit and/or activity: size, location, including a map where available, product, date of the beginning of the conversion period and yield estimates.
* Date of the last internal inspection with the name of the ICS inspector. Internal inspection shall be inspected by the internal inspector annually .
* Date of the last use of inputs.
* Date and version of the list of members of group of operators.
* The signed membership agreements between the member and the group of operators as legal person, which should include the rights and responsibilities of the member.
* The internal inspection reports signed by the ICS inspector and the inspected member of the group of operators and including at least the following elements.

1. The name of the member and the location of the production unit or premises, including purchase and collection centres
2. The date and starting and ending hour of the internal inspection.
3. The findings of the inspection.
4. The audit scope/perimeter.
5. The date of issue of the report.
6. The name of the internal inspector

* The training records of the ICS inspectors consisting of:

1. The dates of the training.
2. The subject matter of the training.
3. The name of the trainer.
4. The signature of the trainee.
5. Where appropriate, an assessment of the knowledge acquired i.e., training effectiveness evaluation.
6. The training records of the members of the group of operators.

* The records of the measures taken in case of non-compliance by the ICS manager, which include:

1. The members subject to measures in case of non-compliance, including those suspended, withdrawn or required to comply with a new conversion period.
2. Documentation of identified non-compliance.
3. Documentation of follow-up of the measures.

The ICS manager shall immediately notify the MS ASPL of the following information:

1. any suspicion of major and critical non-compliance
2. any suspension or withdrawal of a member or a production unit or premises, including purchase and collection centres, from the group;
3. any prohibition of the placing on the market of a product as organic or in-conversion, including the name of the member or members concerned, the relevant quantities and lot identification.

* Traceability records, including information on the quantities, on the following activities, where relevant:

1. Purchase and distribution of farm inputs including plant reproductive material by the group of operators.
2. Production including harvest, storing, preparation, delivery of products from each member to the joint marketing system, placing on the market of products by the group of operators

* The written agreements and contracts between the group of operators and subcontractors including information on the nature of the subcontracted activities.
* The appointment of the ICS manager.
* The appointment of the ICS inspectors as well as the list of ICS inspectors.
* MS ASPL Applicant and Operators shall follow the language of the Regulations of the European Union. EU regulation and supplementary acts available in 24 languages, including French, Spanish, English.
* Internal Organic Standard
* The internal organic standard shall be written by the ICS operator for the specific local situation of the organic project and shall summarise all applicable requirements of Regulation 848/2018 organic regulations
* It must be presented in an adequate language and form, according to the knowledge of ICS staff and farmers.
* Relevant if Grower group uses a language other than English: The internal standard's translated version in English will be made available for MS ASPL to verify.
* Registration of new farmers
* ICS-farmer contract, is required to be signed by each farmer and the ICS operator.
* The contract must be written in a language that the farmer understands. It is necessary to include contractual responsibilities adhere to the internal organic standard. The contract will also be offered in English as per the official communication language of MS ASPL.
* Grower Group Sanction policy, Control measures-Process of registration of farmers, internal inspections, approval, disciplinary measures, The consequences of violation of the contract shall be in a language which is understood by the farmer and translated version of all this records in English shall be available for the verification of MS ASPL. must be clear (sanction policy).

MS ASPL auditor shall verify the group of operators as per the below;

1. MS ASPL auditor evaluating and verification of thefunctioning and maintaining of the ICS of a group of operators at least.
2. MS ASPL auditor shall verify and evaluate the documented procedures of the ICS in contrast of the requirements established in Regulation (EU) 2018/848.
3. MS ASPL auditor shall verify and evaluate the list of members of the group of operators with the required information for each member is continuously updated and aligned with the scope of the certificate.
4. MS ASPL auditor shall verify and evaluate the all members of the group of operators comply with the criteria set out in Article 36(1)(a), (b) and (e) of Regulation (EU) 2018/848 throughout their participation in the group of operators.

E - MS ASPL auditor shall verify and evaluate the training and competence of ICS inspectors and also proportionate and adequate ICS inspectors without conflicts of interest.

F- MSASPL auditor shall verify and evaluate the internal inspections of all members of the group of operators and their activities and production units or premises including purchase and collection centres which should carried out at least annually and documented.

G- MSASPL auditor shall verified and evaluate the new members or new production units and new activities of existing members, including new purchase and collection centres, accepted which should be approved by the ICS manager on the basis of the internal inspection report according to the ICS documented procedures that have been put in place.

H- MSASPL auditor shall verified and evaluate that the ICS manager takes appropriate measures in case of non-compliance, including their follow up, according to the ICS documented procedures that have been put in place and also any notification to the MSASPL.

I- MSASPL auditor shall verified and evaluate the internal traceability for all products and members of the group of operators is ensured by estimating quantities and by cross-checking the yields of each member of the group of operators.

J-MSASPL auditor shall verified and evaluate the maps or sketches with cardinal directions and geo-location of the production units and premises to be physically inspected, as provided by the groups of operators.

K- MSASPL auditor shall verified and evaluate the production units, equipment, means of transport, premises and other places under the control of the group of operators.

L- MSASPL auditor verified the traceability, labelling, presentation, advertising and relevant packaging materials by the following methods.

1. Interviews with operators and staff.
2. sampling and laboratory analysis.
3. The examination of the control system that operators and groups of operators have put in place, including an evaluation of its effectiveness.
4. The examination of non-compliances found during previous inspections and the measures taken by the operators or by the groups of operators to address them.
5. any other action required to identify cases of non-compliance.
6. MSASPL auditor shall check the traceability by appropriate documents including stock and financial records such as.
7. The name and address of the supplier and, where different, of the owner or the seller, or the exporter of the products.
8. the name and address of the consignee and, where different, of the buyer or importer of the products.
9. The certificate of the supplier in accordance.
10. The appropriate lot identification
11. MSASPL auditor shall verify and evaluate the mass balance covers the following elements justified by appropriate documents including stock and financial records, where relevant:
12. The nature and the quantities of products delivered to the unit and, where relevant, of materials bought and the use of such materials, and, where relevant, the composition of products.
13. The nature and the quantities of products held in storage at the premises including at the time of the physical on-the- spot inspection.
14. The nature and quantities of the products that have left the unit of the operators or groups of operators to the consignee’s premises or storage facilities.
15. In case of operators or groups of buy or sell the product(s) without storing or physically handling the product(s), the nature and the quantities of products that have been bought and sold.
16. The yield of the products obtained, collected or harvested over the previous year.
17. The estimated or actual yield of the products obtained, collected or harvested over the current year.
18. The number and/or weight of livestock managed over the current and previous year.
19. Any losses, increase or decrease in quantity of products at any stage of production, preparation and distribution.
20. The total output of the holding in terms of organic and non-organic products.
21. MSASPL do risk assessment to select the sample of the members of the group of operators.
22. Minimum announced audit frequency is once in a year. For group of operators, every year, we shall re-inspect at least 5 % of the members of a group of operators, but not less than 10 members. Where the group of operators has 10 members or less, all members shall be re-inspected.
23. In addition to the annual inspection, at least 10 % of additional controls and of all physical on-the-spot inspections carried out, at least 10 % shall be without prior notice to the operator (unannounced) shall be performed, and it should be based on the risk assessment. No fee is charged from the operator for conduct of unannounced audits.
24. Controls carried out as a follow-up on a suspected or established non-compliance shall not count towards the additional controls
25. The physical on-the-spot inspection and the sampling shall be carried out by the control authority or control body at the most appropriate times in order to verify compliance on critical control points.
26. For the high-risk products referred to in Article 8, the control authority or control body shall carry out, at least, two physical on-the-spot inspections per year of operators or groups of operators. One of these physical on-the-spot inspections shall be without prior notice.
27. The MSASPL shall allocate reasonable time for the control of a group of operators, proportional to the type, structure, size, the products, the activities and output of organic production of the group of operators.
28. MSASPL shall carry out witness audits in order to verify the competence and knowledge of ICS inspectors.
29. MSASPL assess whether there is a failure of the ICS based on the number of non-compliances undetected by the ICS inspectors and the result of the investigation of the cause and the nature of the non-compliances.

**Records:**

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| Application of group of operator | ASPL-CD-FR-41(EU) |
| OMP of group of operator | ASPL-CD-FR-42(EU) |
| Inspection checklist of group of operator | ASPL-CD-FR-43(EU) |
| Risk Assessment for Group of operator | ASPL-CD-ANX-67(EU) |