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INDIA COUNCIL OF FOOD AND AGRICULTURE (ICFA)-AGROCERT



INDIA Good Agriculture Practices (INDGAP) Certification

Certification Process - Group Certification



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1. OBJECTIVE

To ensure an objective assessment and certification of the INDGAP Group produce and promote uniformity in the operation of the certification scheme and the interaction between the **ICFA-AC** and the Producer Group seeking certification.

2. SCOPE

This document covers the Group certification process of INDGAP under Option 2 group certification.

3. CERTIFICATION PROCESS- OPTION 2 GROUP CERTIFICATION

3.1 Legality, Administration and Structure

3.1.1 Legality

3.1.1.1 The Producer Group shall be registered as a legal entity as Producers Management Unit. This legal entity shall have ultimate responsibility over the production, handling and ownership of the products, thus it is responsible for the compliance with the standard.

3.1.1.2 The legal entity shall enter into a contractual relationship and will have Certification Agreement with **ICFA-AC**, and becomes the sole holder of the certificate.

3.1.2 Producers and production sites

3.1.2.1 Requirement of producer groups

- i) The administrative structure of the producer group shall be documented and clearly identify the relationship between the producers and the legal entity. There shall be written signed contracts between each producer and the PMU. The contracts shall include the following elements:
 - a) Name or legal identification of the producer,
 - b) Contact address,
 - c) Details of the individual production locations,
 - d) Details of areas (crops) or quantity (Tonnage)
 - e) Commitment to comply with the requirements of the standard,
 - f) Agreement to comply with the group's documented procedures, policies
 - g) Signature of producer and group representative and
 - h) Any other internal requirements not being met.



- ii) The producer group registered members must be legally responsible for their respective production locations

3.1.2.2 Requirements for multisites

- i) All PMUs shall be owned or rented and under the direct control of the legal entity
- ii) For PMUs that are not owned by the legal entity, there shall be written contract in force between each PMU owner and the legal entity. The contract shall include the following elements:
 - a) Certificate holder name and legal identification,
 - b) Name and/or legal identification of the site owner
 - c) Site owner contact address,
 - d) Details of individual PMUs
 - e) Signature of both parties' representatives
- iii) The certificate holder is legally responsible for all the registered production including placing the product on the market

3.1.3 Producer and site internal register

- i) A register shall be maintain of all contracted group member producers, and of all the applicable sites used for production in accordance with the standard.

3.1.3.1 Requirements of producer groups

- i) All producers in the producer group internal register must be registered individually.
- ii) The register shall at least contain the following information for each producer:
 - a) Name of producer,
 - b) Name of contact person,
 - c) Full address (physical and postal),
 - d) Contact data (telephone number and e-mail and/or fax number),
 - e) Other ID (VAT Number, PAN, etc),
 - f) Produce registered
 - g) Growing/Production area and/or quantity for each registered produce
 - h) INDGAP status

3.1.3.2 Requirements of Multisites

- i) Additionally the register shall at least contain the following information for each site:
 - a) Relation of legal entity with PMU(ownership, rented etc)
 - b) PMU location
 - c) Product registered
 - d) Growing/Production area and/or quantity for each registered produce



4 QUALITY MANAGEMENT SYSTEM OF GROUP FACILITY

4.1 Management and Organization

4.1.1 Structure

- a) The structure should enable the appropriate implementation of QMS across all registered producer members or PMUs.
- b) The producer group or PMU shall have a management structure and sufficient suitably trained resources to effectively ensure that the registered producers meet the requirements of GAP on their production locations.
- c) The organizational structure of the group shall be documented and shall include individuals responsible for:
 - i) Managing the implementation of GAP in the group.
 - ii) Managing the QMS
 - iii) The Internal inspection of each producer member and/or PMU annually (i.e. Internal Inspectors)
 - iv) The Internal audit of the Quality Management System and verifying internal inspections (i.e. Internal Auditors)
 - v) Technical advice to the group (depending on the scope of the group). This should be the same person as point (i) above.

4.1.2 Responsibility and Duties

The duties and responsibilities of all personnel involved with the compliance of GAP requirements shall be documented, and an individual who holds a position of sufficient seniority and resources to serve as the overall responsible person will be nominated for maintenance of the GAP certification.

4.1.3 Competency and Training of Staff

- i) The management shall ensure that all personnel with responsibility for compliance with the IN D GAP standard are adequately trained and meet defined competency requirements. They shall possess degree /diploma in agricultural sciences with suitable training.
- ii) The competency requirements, training and qualifications for key staff shall be documented and shall meet any defined competency requirements.



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- iii) Records of qualifications and training shall be maintained for all key staff (managers, auditors, inspectors, etc.) involved in compliance with GAP requirements to demonstrate competence.
- iv) The internal auditor(s) and inspector(s) shall undergo training and evaluation on the job audits/inspections to ensure consistency in their approach and interpretation of the standard.
- v) Systems shall be in place to demonstrate that key staff is informed and aware of development, issues and legislative changes relevant to the compliance to the GAP standard.

4.2 Document control

- a) All documentation relevant to the operation of QMS for INDGAP compliance shall be controlled. This documentation shall include:
 - i) Quality Manual
 - ii) Operating procedures,
 - iii) Work instructions
 - iv) Recording forms
 - v) Relevant documents of external origin
- b) Policies and procedures shall be sufficiently detailed to demonstrate the group's control of the principal requirements of the GAP standard.
- c) Relevant procedures and policies available to the producer group registered members and key staff.
- d) Quality Manual shall be reviewed periodically to ensure that it continues to meet the requirements of the INDGAP standard and those of the producer group. Any relevant modifications of the INDGAP standard or published guidelines that come into force must be incorporated into the manual within the time period specified.

4.2.1 Document Control Requirements

- a) There shall be a written procedure defining the control of documents.
- b) All documentation shall be reviewed and approved by authorised personnel before issue and distribution.
- c) All controlled documents shall be identified with an issue number, issue date/review date and be appropriately paged.
- d) Any change in these documents shall be reviewed and approved by authorised personnel prior to its distribution.
- e) A copy of all relevant documentation shall be available at the places where the QMS is being controlled.
- f) There shall be a system in place to ensure that documentation is reviewed and that following the issue of new documents, obsolete documents are effectively rescinded.



- g) The documents of external origin used in the management of Group Certification shall be controlled

4.2.2 Records

- i) There shall be records to demonstrate effective control of the INDGAP Quality Management System requirements and compliance with the requirements of GAP standard.
- ii) Records from the QMS related to compliance of INDGAP requirements shall be kept for a minimum of 3 years.
- iii) Records shall be genuine, legible, stored and maintained in suitable conditions and shall be accessible for inspection as required.
- iv) Records that are kept on-line or electronically are valid. If a signature is required, this can be a password or electronic signature that ensures the unique reference and authorization of the person signing. If a written signature of the responsible person is needed then this must be present. The electronic records must be available during the ICFA-AC inspections. Back-ups must be available at all times.

4.3 Complaint Handling

- i) There will be a system for effectively managing customer complaints and the relevant part of the complaint system shall be available to the producer members.
- ii) There shall be a documented procedure that describes how complaints are received, registered, identified, investigated, followed up and reviewed.
- iii) The procedure shall be available to customers as required.
- iv) The procedure shall cover both complaints to the group and against individual producers or sites.

4.4 Internal Audits and Inspections

Internal audit systems shall be in place both to assess the adequacy and compliance of the documented QMS and to inspect the producers and farms against the INDGAP standard.

4.4.1 Internal Quality Management System Audit

- a) The QMS for the INDGAP scheme shall be audited at least annually.
- b) Internal auditors shall be suitably trained and independent of the area being audited.
- c) The **ICFA-AC** will evaluate the competence of the internal auditor during the external audit

Note-It is permitted for the same person to initially develop the QMS within the group, and then undertake the required annual QMS audit, however the person responsible for



the day-to-day ongoing management of the QMS is not allowed to undertake the required subsequent annual internal QMS audits.

- d) Records of the internal audit plan, audit findings and follow up of corrective actions resulting from an audit shall be maintained and available.
- e) Completed QMS checklist with comments for every QMS control point must be available on site for review by the auditor during external audit
- f) Where the internal audit is not performed in one day but continuously over a 12 month period, a predefined schedule should be in place.

4.4.2 Internal Producer and Production Management Unit (PMU) Inspections

- a) Inspections shall be carried out at each registered producer (and corresponding production locations) or PMU at least once a year against all INDGAP control point and compliance criteria. The Control Points and Compliance Criteria (CPCC) checklist based on respective INDGAP standards shall be used both for internal and external assessments. Any producer or producer group opting for BasicGAP needs to comply with Annex A Table 01 of Section 3 whereas any producer opting for INDGAP needs to comply with Annex B Table 01 of Section 3. If a group of farmers join to seek a group certification they need to comply with requirements stipulated in Section 4C.
- b) All critical, Major and Minor control points must be inspected in full.
- c) Internal inspectors shall meet competence requirements.
- d) Internal inspectors shall be independent of the area being audited. Internal auditors cannot inspect their own daily work.
- e) New members of the group and new PMUs shall always be internally inspected and approved prior to entering into internal INDGAP register.
- f) The original inspection reports and notes shall be maintained and available for the CB inspection as required.
- g) The inspection report shall contain the following information:
 - i) Identification of registered producer and/or production location(s)
 - ii) Signature of the registered producer or PMU responsible
 - iii) Date of inspection
 - iv) Inspector name
 - v) Registered products
 - vi) Evaluation result against each INDGAP control point
 - vii) The checklist shall include details in the comments section for the:
 - a) Critical control points that are found to be compliant
 - b) Critical and Major control points that are found to be noncompliant and
 - c) Critical and Major control points that are found to be noncompliant unless a checklist is issued by INDGAP that predetermines which CPCC must be commented on. This is needed, in order to enable the audit trail to be reviewed after the event.
 - viii) Details of any non-compliances identified and time period for corrective action,



- ix) Inspection results with calculation of compliance
 - x) Duration of inspection
 - xi) Name of internal auditor who approved the checklist
- h) The internal auditor / audit team shall review and make the decision on whether the producer or site is compliant with the IND GAP requirements, based on the inspection reports presented by the internal inspector.
- i) In case there is only one internal auditor who also performs internal inspection, another person i.e. MR must approve the internal inspections
- j) Where the internal inspection takes place continuously over a 12 month period, a predefined schedule should be in place.

4.5 Non-compliances, Corrective Actions and Sanctions

- a) There shall be a procedure to handle non-compliances and corrective actions which may result from internal or external audits and/or inspections, customer complaints or failures of the QMS.
- b) There shall be documented procedures for the identification and evaluation of non-compliances to the QMS by the group or by its members.
- c) Corrective actions following non-compliances shall be evaluated and a timescale defined for action.
- d) Responsibility for implementing and resolving corrective actions shall be defined.
- e) A system of sanctions and non-conformances shall be operated with their producers or PMU that meet the certification requirement.
- f) The group shall have mechanisms in place to notify the GAP approved Certification Body immediately of Suspensions or Cancellations of registered producers.
- g) Records shall be maintained of all sanctions including evidence of subsequent corrective actions and decision-making processes.

4.6 Product Traceability and Segregation

- a) Product meeting the requirements of the INDGAP standard and marketed as such shall be traceable and handled in a manner that prevents mixing with non-GAP approved products.
- b) There shall be a documented procedure for the identification of registered produce and to enable traceability of all product, both conforming and non-conforming to the applicable production sites. A mass balance exercise must be carried out to demonstrate compliance within the legal entity.
- c) Effective systems and procedures shall be in place to negate any risk of misuse of label or mixing of GAP certified and non-GAP certified products.



4.7 Withdrawal of Certified Produce

- a) Documented procedures shall be in place to effectively manage the withdrawal of registered product.
- b) Procedures shall identify the types of event which may result in a withdrawal, persons responsible for taking decisions on the possible withdrawal of product, the mechanism for notifying customers and the Certification Body; and methods of reconciling stock.
- c) The procedure shall be capable of being operated at any time.
- d) The procedure shall be tested in an appropriate manner at least annually to ensure that it is effective and records of the test retained.

4.8 Subcontractors

- a) Procedures shall exist to ensure that any services subcontracted to third parties are carried out in accordance with the requirements of the GAP standard.
- b) Records shall be maintained to demonstrate that the competency of any subcontractor is assessed and meets the requirements of the standard.
- c) Subcontractors shall work in accordance with the group's QMS and relevant procedures and this shall be specified in service level agreements or contracts.

4.9 Registration of additional producers or PMU to the certificate

New producers and sites may be added to the certificate. In fact it is the responsibility of the certificate holder (Group or multisite) to immediately update the ICFA-AC on any addition or withdrawal of sites to/from the list of registered producers.

- a) Upto 10% of new producer sites in one year can be added to the approved list by registering the producer sites with **ICFA-AC** without necessarily resorting to further verification by the **ICFA-AC**
- b) When the number of the approved registered producer sites increases by more than 10% in one year, further external sample inspection (minimum is the square root of new producers/sites) of the newly added producer sites and optionally an audit of QMS will be required during that year before additional producers can be added to the approved list
- c) Regardless of percentage by which the number of registered producer sites increase in one year, should the newly registered farm increase the area of previously approved registered products by more than 10% in a year or there is 10% change in producer further external sample inspection (minimum is the square root of new producers/farms) of the newly added farms or producers and optionally an audit of QMS will be required during that year before additional farms/ producers can be added to the approved list.