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Grower Group (GG) requirements (NOP, COR and EU 848/2018)

Group certification: This Guideline details the requirements for certification of a group of small landholding farmers that are organized under one management and marketing system and have practices/activities that are uniform within the group, located in a similar geographical or social region, whose crops are marketed collectively. The contents of this requirement are taken from 7 CFR205 , (EU) 2018/848 and its applicable secondary acts, [C.12-GG requirements under COR.](#)

Geographical proximity Criteria: The site-specific conditions of an operation, such as infrastructure, topography, common soil, water source, and products produced will affect “geographic proximity”.

This Guideline provides the requirements of group certification to potential and existing clients along with guidance to ZENITH staff.

1. Group Organization:

- Producer groups can be cooperatives, associations, or similar organizations. The certificate holder must be a legal entity.
- Each GG shall have own legal personality, [Per EU848/2018 Art.36.1\(d\).](#) *{GoO shall be a legal entity recognized by national law as having rights and obligations. Depending on national law, some legal forms may be recognized without registration}*

Examples of farmer composed legal entities:

- A registered agricultural cooperative or other kind of farmers’ association
- Any type of society or association (foundation, NGO, society, self-help group, community enterprise, community based organizations, etc.) composed of farmers with the purpose of supporting organic farmers and market their products.
- Farmer companies, limited company with a registered business purpose of joint marketing of products from organic farmers who are shareholders of the company.

**In Simpler terms, Contract production not allowed per EU. Meaning A processing/export company with associated/contracted farmers is NOT COMPOSED OF FARMERS and cannot be certified as GoO*

- Must be organized into production units based on crops grown, production practices, harvest schedules, centralized processing/distribution and marketing facilities (to be inspected by ZENITH each year), geographic proximity, distance* (**ZENITH will determine whether the distance of each production unit meets the requirements of group certification**), use of a common recordkeeping system and common input supply, if off-farm inputs are used.
- Must utilize a common post-harvesting handling system. Post-harvest handling includes activities such as washing, cleaning, sorting, packing, cooling, storing of raw agricultural products, and facility pest management
- The production unit, site, and/or facility is considered the measurement unit of the operation that is subject to annual inspections.
- Establish a system for internal controls comprising a documented set of control activities and procedures

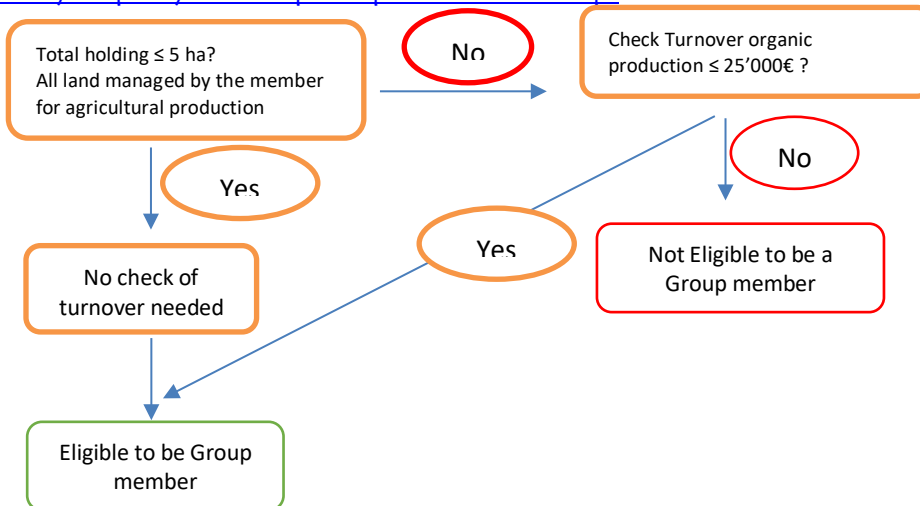
	NOP	COR	EU		
Member Composition	No Specific Size limitation. ICS may chose to limit the number of members or sub-units that are included in a production unit. The limiting factor should be based on the feasibility of effective oversight	The maximum size shall be 2,000 members	o Individual certification cost represents more than 2% of each member’s Organic turnover. <i>(For Example: ZENITH individual certification fees/farmer cost 1500\$ from 0-5ha range, therefore mentioned fees must be more than 2% of Farmers annual turnover)</i>		
		Small farm (with reference to grower group certification) Both: a. farm where the cost of external certification is 2% or more of their annual gross revenue, and b. less than 50 acres.	Area range	ZENITH individual certification fees/farmer cost	Farmers annual turnover

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	by ICS personnel and factors such as size and accessibility of the sub-units.		<table border="1"> <tr> <td>0-5ha</td> <td>1500\$</td> <td>2000\$</td> <td>40\$</td> <td>Yes</td> </tr> <tr> <td>0-5ha</td> <td>1500\$</td> <td>80,000\$</td> <td>1600\$</td> <td>No</td> </tr> </table> <p><i>*Certification fees enlisted here is an eg. Only, for more details refer ZENITH fee structure</i></p> <ul style="list-style-type: none"> • Annual turnover of organic production must not more than 25,000 EUR(€) or, • Farmers who have each holdings of maximum:-five hectares • 0.5 hectares, in case of greenhouses, or • 15 hectares, exclusively in the case of permanent grassland 	0-5ha	1500\$	2000\$	40\$	Yes	0-5ha	1500\$	80,000\$	1600\$	No
0-5ha	1500\$	2000\$	40\$	Yes									
0-5ha	1500\$	80,000\$	1600\$	No									
Large Farms	-	ICS must identify Large Farms and its Criteria in their procedure. <i>*In farmer list that you will be submitting to ZENITH, highlight all large Farms. All large Farms will be audited by ZENITH. (Large area must be identified per regional location/data, provide evidence for that)</i>	-										

*EU Specific as indicated in above Table (In a Simplified Manner):

Do you qualify for Group of Operator membership?



2. Group participation:

- Participation in the grower group is limited to those group members who market their organic production only through the group. Additional workers, such as family members or other group members, are allowed to provide labor during production activities throughout the season. Use of hired workers along with other than family or group members or farmer to provide labor during production activities throughout the season is allowed. However, if a landowner is only using hired workers then that landowner should be excluded from the group.

[Extracted Copy of ZENITH Guidance & Working Instruction]

- Individual group members may market their product as nonorganic outside of the group but must maintain all sales documentation of such transactions or sales activity. All sales must be reported to the ICS and the ICS must maintain complete documentation of organic crop harvest and sales and nonorganic crop harvest and sales.
- Individual certification of a group member beyond the grower group is not allowed. If a grower has their own certification outside of the group, there is no need for certification as a group member and that grower should be excluded from the group certification

3. Internal quality management system/Control System:

- Establishes and governs the review, monitoring, training, and inspection (along with frequency) of the producer group operation, and the procurement and distribution of shared production and handling inputs and resources, to maintain compliance with the organic regulations
- Must maintain all documentation of the group members and facilities, including an ICS Manual, OSP, production plans, materials used and rate of applications, harvest records, contractual agreements with each group member, purchase and distribution of farm inputs including plant reproductive material by the group and internal inspection reports

The ICS must identify criteria for high-risk producer group members and production units (Applicable to NOP).

Below mentioned are the Examples of risk factors that the ICS may consider, but are not limited to:

- Members identified with noncompliance's by ICS and Certification body;
- Application of prohibited materials adjacent to member fields;
- Split or parallel operations (i.e., operations that are also producing nonorganic/Transition agricultural products);
- Producer group members with incomes greater than \$5,000 USD per year (**Applicable in US Only**)
- The procurement, availability, and distribution of inputs and resources to members;
- The prevalence of nonorganic production of similar products and crops in the region;
- Post-harvest handling practices designed to prevent commingling and contact with prohibited substances;
- New producer group members;
- Size of producer group member's production or gathering areas (a producer group member that is considerably larger than the other producer group members in a production unit);
- Significant expansion of a producer group member's production area.

A. Internal Control System Manual:

The ICS Manual (Documented Policies and Procedures) must include, but are not limited to the following points:

- **Organization Chart:** must provide a meaningful description of the group's structure and functioning of the ICS (how the various duties are divided among the ICS staff and to identify the structure among personnel).
- **Responsible Person Activities:** Name, address and contact person of the legal entity applying for certification, the personnel responsible for overseeing and implementing the ICS structure, and all site managers responsible for the day-to-day compliance.
- **Activities, Policies and Agreement:** Must include a description of the sub-units and facilities, farming practices, materials used and rates of application, harvest records, contractual arrangement with each individual member to meet the requirements specified for compliance to the group's internal standard and specific standard regulation, and internal inspection reports. The ICS Manual shall reflect the group's characteristics, internal policies, and procedures employed by the group.
- **Group Members and Production unit Criteria:** Provide a description of the production unit(s) and number of group members per production unit(s) along with the characteristics of high-risk producer group members and producer group production units.
- **Production system Overview:** Provide a general overview of the production system of group members, Organic/Non-Organic/Transition Crop details including, but not limited to, structure and size of group members (average, smallest and largest sub-unit), crops and common farming methods.
- **New Member acceptance/Registration of the members:** Describe procedures for accepting new members into the producer group operation and registration of the member, including initial inspection and compliance determination or, where appropriate, the approval of new production units

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or new activities of existing members upon the approval by the ICS manager on the basis of the internal inspection report

- **Conflicts of interest:** Describe measures to protect against potential conflicts of interest and protect internal control system personnel from retribution
- **Field Activities:** Description of all the steps from Sowing until final sale. This description should include Sowing , harvest , Storage, post-harvest handling procedures, logistics, collection, sorting, labeling, and packaging until final sale. All ICS personnel and facilities involved in the processing and storage of organic product must also be included.
- **Shared Resources:** Describe how shared resources, including production practices and inputs, are procured and provided to all producer group members and personnel;
- **Internal Inspection:** Include the annual internal physical on-the-spot inspections of each member of the group, and any additional risk-based inspections, in any case scheduled by the ICS manager and conducted by ICS inspectors;
- The measures in cases of non-compliance detected during the internal inspections, including their follow-up
- Describe how **training, education, and technical assistance** is provided to producer group members and internal control system personnel (training of the ICS inspectors, which is to take place at least annually and to be accompanied by an assessment of the knowledge acquired by the participants ; training of members of the group on the ICS procedures and the requirements of Regulation/Standard);
- **Record-keeping (includes Financial Traceability), Audit Trail and Mass Balance:** Describe the system of records used to demonstrate compliance, including traceability and mass-balance audits and [the control of documents and records \(Applicable for EU operations\)](#) *{The internal traceability, which shows the origin of the products delivered in the joint marketing system of the group and allows the tracing of all products of all members throughout all stages, such as production, processing, preparation or placing on the market, including estimating and cross-checking the yields of each member of the group.}*; and
- Describe how **internal monitoring, surveillance, internal inspection, sanctions, and auditing** are used to assess the compliance of all producer group members.

*As a best practice, **internal monitoring and surveillance** should cover critical organic control points may include, for example, buffer areas, condition of crops and/or wild crops and animals, soil quality indicators, handling practices, input and equipment use and storage areas. A **description of sanctions** may cover the review of internal inspection results to determine member compliance; and the processes to address non-compliances, impose sanctions, remove noncompliant producer group members and reporting non-compliances to the certifying agent/CB. A **description of the auditing methods** could cover mass-balance audits to reconcile the expected and actual yields and sales of [producer members, producer group production units, and producer group operations](#).*

B. Internal Control System Personnel:

- ICS personnel must have clear roles and responsibilities and be provided the **resources, training, education, and technical assistance** to fulfill their roles and responsibilities.
- Must Appoint an ICS manager and one or more ICS inspectors who may be a member of the group. Their positions shall not be combined. The number of ICS inspectors shall be adequate and proportional in particular to the type, structure, size, products, activities and output of organic production of the group. The ICS inspectors shall be competent with regard to the products and activities of the group.
- ICS must maintain all staff documentation including resume, confidentiality, conflict of interest, training, appointment of ICS manager , ICS Inspector and any other relevant personnel document .
- ICS manager shall verify :
 - ✓ The eligibility of each member of the group regarding the criteria set out per standard requirement
 - ✓ Develop the ICS procedures and the relevant documents and records, keep them up to date and make them readily available to the ICS inspectors, and where relevant, to the members of the group;
 - ✓ Draw up the list of the members of the group and keep it up to date
 - ✓ Assign tasks and responsibilities to the ICS inspectors
 - ✓ Be the liaison between the members of the group and the control body, including requests for derogations;

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- ✓ Verify annually the conflict of interest statements of the ICS inspectors
- ✓ Ensure adequate trainings for the ICS inspectors and carry out an annual assessment of ICS inspectors' competences and qualifications;
- ✓ Approve new members or new production units or new activities of existing members
- ✓ Schedule internal inspections and ensure their adequate implementation in accordance with the ICS manager's schedule ,in case serious deficiencies observed in imposing appropriate measures or carrying out the necessary follow-up in response to non-compliance identified by the ICS inspectors or by the control body;
- ✓ Decide on measures in case of non-compliance in line with the ICS measures established by documented procedures in accordance with above mentioned point and ensure the follow-up of those measures;
- ✓ Decide to subcontract activities, including the subcontracting of the tasks of ICS inspectors, and sign relevant agreements or contracts

The ICS inspector shall:

- ✓ Carry out internal inspections of the members of the group according to the schedule and the procedures provided by the ICS manager;
- ✓ Draft internal inspection reports on the basis of a template and submit it within a reasonable time to the ICS manager;
- ✓ Submit at appointment a written and signed statement on conflict of interest and update it annually;
- ✓ Participate in trainings;

- ICS personnel must be competent enough which must include but are not limited to:

fluent in the local/English language and dialect of the group members	ability to read and write and report in the chosen ICS language	well versed with Applicable Standard (NOP/EU/COR/USCOEA) especially in the sections of the regulation that relate to the sub-units and members, sites or facilities that they review.
familiar with agricultural/Organic production systems	Able to demonstrate competence in internal control procedures and an understanding of the internal regulations.	

C. Conflict of Interest (COI):

COI Policy must ensure :

- Duties performed by the ICS personnel are not influenced by any conflict of interest that the personnel may have.
- Shall provide guidance to make personnel aware of possible conflict of interest situations
- Describe measures to protect against potential conflicts of interest and protect internal control system personnel from retribution

D. Internal Organic Standards:

- Reference standard for conducting the internal inspection and verification of group members
- Must be based on applicable standard (NOP/COR/EU/USCOEA)
- Defines the production rules all group members are committed to and explains the production practices(Crops grown, Conversion requirements, Inputs, PWD measures, Fertility Practices, Sowing until Sale practices) applied by group members.
- Must address the measures taken to prevent commingling of organic and Transition/conventional products and contamination with prohibited substances(Includes Product identification, Buffer Zone adequacy, measures required to prevent drift, Clear instructions for separation of organic and conventional produce during production, harvest and post-harvest.
- ***All sites (organic , Transition and conventional) must be disclosed in the ZENITH Organic System/Management Plan and are subject to internal inspection by the ICS and by ZENITH as per applicability and records must be maintained for same.***

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- New activities of existing member must be added upon the approval of responsible person (ICS Manager or Approval manager or Approval committee member, per ICS protocols/procedure) on the basis of internal inspection report.
- Include a Input approval process (ICS must provide a list of approved input materials to all group members)
- Must include the decision making procedures used and sanctions procedures for individual members who do not comply with applicable standards
- Irregularities and Non-compliances found during internal audits/external audits must be recorded/informed to the group member along with the corrective actions including those suspended, withdrawn or required to comply with a new conversion period imposed. The ICS and group member must agree upon a time for the corrective actions to be submitted and/or completed along with the follow up (if any), and **further must inform to ZENITH immediately with actions**. Must have a recorded documentation of follow-up of the measures
- The ICS shall require the member to respond to the NC report issued by the ICS within 30 working days of its receipt. The response shall either provide evidence of completion of corrective action taken to address each NC or present a plan with milestones as to how each NC will be addressed. This plan shall include a completion date not exceeding 90 working days from receipt of the NCs. The ICS shall accept times greater than those stated for the closure of a NC as long as they are justified and documented. **{Exclusive to COR}**
- The written agreements and contracts between the group of operators and subcontractors including information on the nature of the subcontracted activities

*Those group member(s) or sub-unit(s) that have been suspended or excluded from the group should not be permitted to rejoin the group until ZENITH approves the measures taken to ensure that the violation is not repeated.

E. Group Member Registration:

- ICS must **Describe procedures for accepting/ registering new**
- **members/New activities of existing members** into the producer group operation, **including initial inspection and compliance determination.**
- A written and signed **contractual agreement** with each member and the group, by which the members commit themselves to below mentioned information, but are not limited to:
 - Comply with applicable Regulation
 - Participate in the ICS and comply with the ICS procedures, including the tasks and responsibilities assigned to them by the ICS manager and the obligation for records keeping,
 - Permit access to production units and premises and be present during the internal inspections carried out by the ICS inspectors and control body/ inspection from CVB and CFIA or another accreditation Body,, make available to them all documents and records and countersign the inspection reports,
 - Accept and implement the measures in cases of non-compliances in accordance with the decision of the ICS manager or the control body, within the given time-frame,
 - Immediately inform the ICS manager on suspected non-compliance;
 - Confirmation by the members of a group of operators that they have not been certified on an individual basis for the same activity for a given product covered by the certification of the group of operators to which they belong.

The following group member information must be collected and documented:

- General information including the name of person(s) responsible for production, identification (Code number), address (or village), GPS Coordinate, date of registration, date of the beginning of the conversion period and yield estimates and any other details to locate the group member, telephone numbers, if the group organizes more than one production units that must also be clearly enlisted.
- Information on the agricultural production area including registered fields and facilities under the group member's management, including the non-organic/Transition fields, crops under the group's common marketing and any other crops produced by the group member for other purposes (e.g. for own

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consumption or local markets), cultivation practices and the management history (date of last application with prohibited substances) of each field, and the total area and area of crop's to be approved for the group's common marketing.

- A field map must be provided to show where the respective fields are located to ensure that internal or external inspectors can find them. The fields must be numbered according to the number represented in the group member's field register where the field management history is also documented.
- A risk assessment must address whether there are any potential negative impacts from neighbouring fields which are not managed organically.

The field staff should conduct separate registration visits before the first internal inspections take place. After the information, documents, and field visits are completed the group member details are added to the registered list of group members and the member can undergo the regular ICS procedures.

The inclusion of a new group member to the registered list of group members must be approved by ZENITH at time of annual inspection.

**Additionally ICS must keep below mentioned records as well in Compiled manner , Per EU requirement*

- Date of the last internal inspection with the name of the ICS inspector (**Applicable to EU & COR**);
- Date of the last external inspection performed by the Certification Body with the name of the inspector (**Applicable to EU**);
- Date and version of the list (ICS Records like Farm Dairies, Internal Inspection Report, Sanction application form ,and Other forms/Templates use by ICS must have documented revision log summary) (**Applicable to EU**);
- 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;

*2021/279 Art. 4: "A member of a group of operators shall register to only one GoO for a given product, also where the operator is engaged in different activities related to that product".
For the same product, e.g. coffee, a farmer cannot be member in different GoOs.
In the example shown, a farmer could be member in one GoO for its organic mangos, and in another for its coffee.
BUT higher risk and needs to careful ICS management*

F. Internal Inspections:

- Conduct internal inspections of each producer group member, at least annually, by internal inspectors with the member present, which must include mass-balance audits and reconciliation of each producer group member's and each producer group production unit's yield and group sales.
- Any additional risk-based/Follow up inspections (criteria may be implementation of Past NC , Addition of new activities, etc), in any case scheduled by the ICS manager and conducted by ICS inspectors must be documented(with reason of additional inspection) and have procedure for that as well.
- *There should be a minimum of 01 Internal Inspector per maximum of 500 farmers (Applicable to NOP).*
- The number of ICS inspectors shall be adequate and proportional in particular to the type, structure, size, products, activities and output of organic production of the group.
- The internal inspectors must complete a report, identify any non-compliances and issues of concern, and submit the report to the ICS manager. The report is then evaluated and sanctions are given to violators as applicable. The ICS manager must inform ZENITH of any non-compliances issued to growers during that year.
- ICS manager shall immediately notify to ZENITH of the following information:
 - ✓ any suspicion of major and critical non-compliance;
 - ✓ any suspension or withdrawal of a member or a production unit or premises, including purchase and collection centers, from the group;

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- ✓ 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.
- **The records of the measures taken in case of non-compliance by the ICS manager, shall include:**
 - (i) the members subject to measures in case of non-compliance, including those suspended, withdrawn or required to comply with a new conversion period; (ii) documentation of identified non-compliance; (iii) documentation of follow-up of the measures;
- **Internal Inspection Report (to be counter signed by ICS inspector and group member) and must be submitted within a timeframe specified in the ICS procedure to the ICS Manager, must include below mentioned additional information:**
 - The name of the member and the location of the production unit or premises, including purchase and collection centers where the activities performed
 - **The date and starting and ending hour of the internal inspection (Applicable for EU operations) ;**
 - The findings of the inspection;
 - The audit scope/perimeter (i.e. NOP, EU, COR, USCOEA, as applicable);
 - The date of issue of the report;
 - The name of the internal inspector;
- **Internal Inspector must conduct the internal traceability , which shows the origin of the products delivered to the ICS and allows the tracing of all products of all members throughout all stages, such as production, processing, preparation or placing on the market, including estimating and cross-checking the yields of each member of the group;**
- **Traceability records, including information on the quantities, on the following activities, where relevant must be maintained:**
 - (i) purchase and distribution of farm inputs including plant reproductive material by the group; (ii) production including harvest; (iii) storing; (iv) preparation; (v) delivery of products from each member to the joint marketing system; (vi) placing on the market of products by the group of operators;

G. Training Requirements for ICS Personnel and Group Members:

- ICS personnel must undergo training that details the technical aspects on how to conduct internal inspection and verification, the respective OSP and internal production standard requirements, and all applicable standards the group is certified to.
- Training shall take place a minimum of once a year. More frequent training may be necessary if standards or certification requirements are revised.
- ICS must carry out an annual knowledge assessment of ICS inspectors' competences and qualifications
- **ICS must receive an external training (conducted by outside certification experts) at least once a year. (Applicable to NOP).**
- All group members should be trained by the field advisor or other competent ICS staff on how to implement the internal organic standard and organic farming practices. Group members may be trained collectively during membership assemblies or on an individual basis. Individual training is important to ensure that each group member's situation, concerns or other issues are addressed.

All trainings for ICS personnel and group members, including participation (along with signature of the trainee), content/ subject matter, dates of the training, name of the trainer and assessment record of ICS Personnel (as applicable), must be documented and available for review by ZENITH.

H. Traceability (Audit Trail), Mass balance and Financial Check (All Programmes):

	Traceability (Audit Trail)	Mass balance	Financial Check
Purpose	To confirm whether products received or sent by the operator or group of operators are organic or Conventional or in-conversion. In order to	To determine the balance between the input(Harvested) and output (Sold/Dispatch) of the operator or group of operators, particularly, verifying the volumes of	To determine authenticity

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	ensure the integrity of organic production, it is necessary to ensure the traceability at all stages of production, preparation and distribution(i.e. From Sowing until Sale/Dispatch).	organic or in-conversion products clearly.	
Checkpoint to be covered	Product should be traced from sale, through storage, to field activities including harvest and planting, back to the original seed or planting material	<p>a)The yield of the products obtained, collected or harvested over the previous year;</p> <p>b)The actual yield of the products obtained, collected or harvested over the current year</p> <p>c) Any losses, increase or decrease in quantity of products at any stage of production, preparation and distribution;</p> <p>d) The nature and the quantities of products held in storage at the premises</p> <p>e) The nature and the quantities of the products that have left the unit of operator or group of operators to the consignee's premises or storage facilities;</p>	<p>a) The name and address of the supplier and, where different, of the owner or the seller, or the exporter of the products shall be identified in invoices</p> <p>b) The name and address of the consignee and, where different, of the buyer or importer of the products shall be identified in invoices</p> <p>c) The certificate of the supplier (Like Certificate number, etc.)</p> <p>d) The appropriate lot identification.</p> <p>e) Verification of financial checks like Delivery Challan, Purchase Receipt of farmers etc</p>

ICS Failure in Functioning or failures to detect or address non-compliance:

Below are some enlisted example of failure, Please be noted that they are not limited to:

- Producing, processing, preparing or placing on the market of products from suspended/withdrawn members or production units;
- Adding new members to the list of members or changing the activities of existing members without following the internal approval procedure;
- Not carrying out the annual internal inspection of a member of the group in a given year;
- Failing to indicate the members which have been suspended or withdrawn in the list of members;
- Serious deviations in findings between internal inspections carried out by the ICS inspectors and certification body;
- Serious deficiencies in imposing appropriate measures or carrying out the necessary follow-up in response to non-compliance identified by the ICS inspectors or by the certification body;
- Inadequate number of ICS inspectors or inadequate competences of ICS inspectors for the type, structure, size, products, activities and output of organic production of the group.

Per EU, ZENITH may withdraw the certificate for the whole group where deficiencies in the set-up or functioning of the system for internal controls, in particular as regards failures to detect or address non-compliance by individual members of the group of operators, affect the integrity of organic and in-conversion products (EU Applicability).

Per NOP ,COR -ZENITH will take actions per Sanction catalogue.

High-risk products/countries (EU Programme): *EU have defined list of high-risk products/countries. Affected operators & GoOs will need to be inspected twice a year , Even more intense sampling will be required for "high risk products". Under EU Additional control measures, ZENITH will consider current and last year (Previous year) high risk product and country for further implementation.*

[Extracted Copy of ZENITH Guidance & Working Instruction]

Terms Description:

Producer group member: An individual engaged in the activity of producing or harvesting agricultural products as a member of a producer group operation.

Producer group operation. A producer, organized as a person, consisting of producer group members and production units in geographic proximity governed by an internal control system under one organic system plan and certification

Producer group production unit: A defined subgroup of producer group members in geographic proximity within a single producer group operation that use shared practices and resources to produce similar agricultural products

Internal control system: An internal quality management system that establishes and governs the review, monitoring, training, and inspection of the producer group operation, and the procurement and distribution of shared production and handling inputs and resources, to maintain compliance with the applicable organic regulations.

Internal Organic Standards: The guidelines and requirements outlined by the ICS to which the group members must follow.

Handle : To sell, process, or package agricultural products, including but not limited to trading, facilitating sale or trade on behalf of a seller or oneself, importing, exporting for sale, combining, aggregating, culling, conditioning, treating, packing, containerizing, repackaging, labelling, storing, receiving, or loading.

Handler: Any person engaged in the business of

handling agricultural products, including producers who handle crops or livestock of their own production, except such term shall not include final retailers of agricultural products that do not process agricultural products

Handling operation: Any operation or portion of an operation (except final retailers of agricultural products that do not process agricultural products) that receives or otherwise acquires agricultural products and processes, packages, or stores such products

Post-harvesting system: The act of handling raw agricultural commodities without further processing. Post-harvest handling activities preserve the essential form of the product and may include, but are not limited to: flotation, washing, sanitizing, cooling, packing, separation from foreign objects or plant parts (ex. cleaning grain), removal of stems leaves or husks, and storage and pest control practices.

Processing: Cooking, baking, curing, heating, drying, mixing, grinding, churning, separating, extracting, slaughtering, cutting, fermenting, distilling, eviscerating, preserving, dehydrating, freezing, chilling, or otherwise manufacturing and includes the packaging, canning, jarring, or otherwise enclosing food in a container

Site: The location of management activities for a given production unit

Sub-unit: A smaller discrete portion of a production unit, such as a field, plot, wild-crop harvest area, or distinct processing area

Additional References:

EU Reg. 2021/279 { [Art 5. Documents and records of a GoO](#) , [Art 6 Notifications from the ICS Manager](#)}

EU Reg. 2021/771 (external control){ [Art. 2 Evaluation of the ICS](#)}

EU Reg. [2021/1698 Control in Third Countries](#)

[NOP-SOE Final rule](#)

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