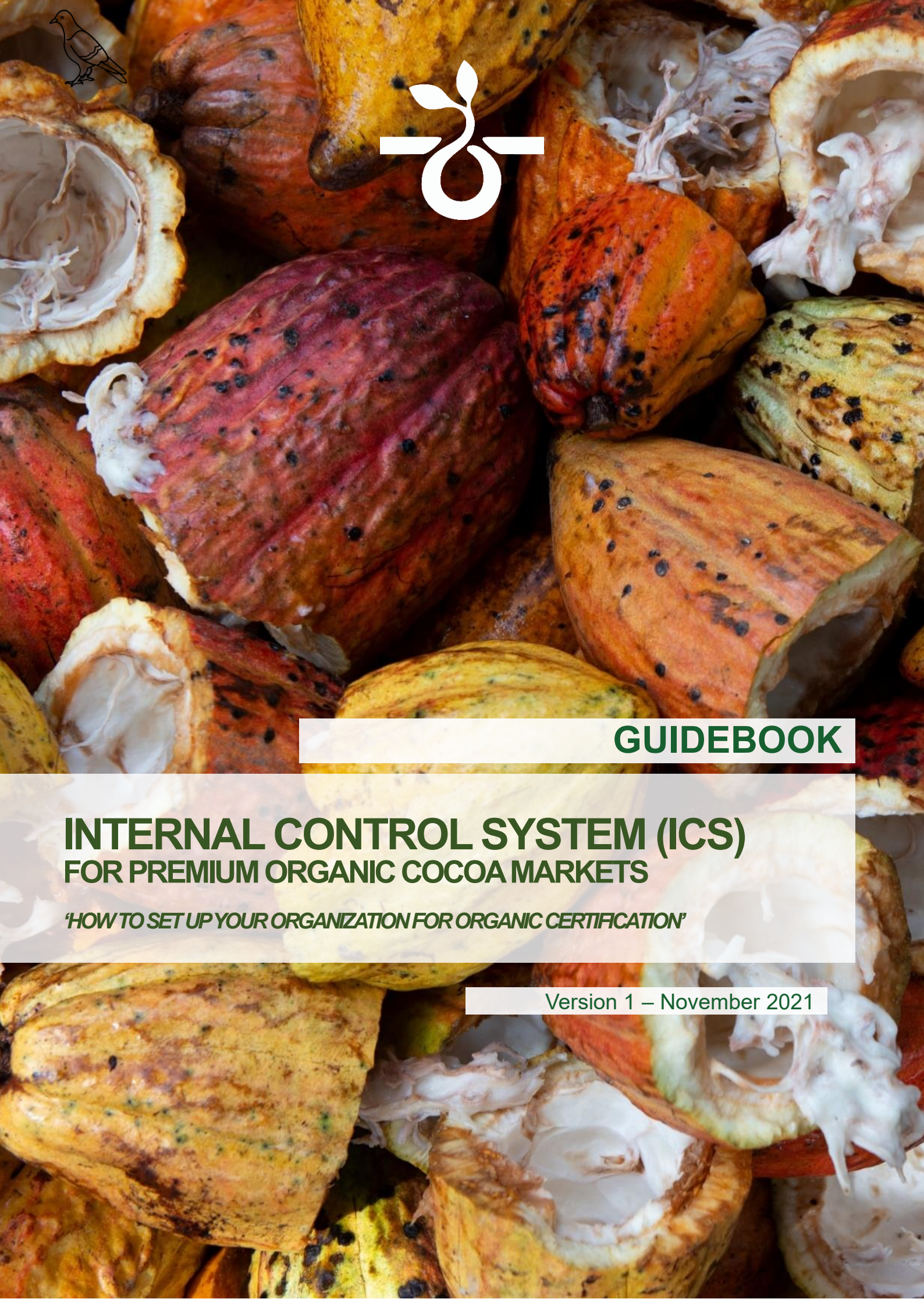

GUIDEBOOK

INTERNAL CONTROL SYSTEM (ICS)
FOR PREMIUM ORGANIC COCOA MARKETS

'HOW TO SET UP YOUR ORGANIZATION FOR ORGANIC CERTIFICATION'

Version 1 – November 2021

Introduction:

What is this Guidebook?

This document is a guide for:

- Informing organizations about organic certification
- Informing companies about Internal Control Systems (ICS)
- Providing a clear guidebook for setting up an Internal Control System (ICS) for organic certification.

Who this Guidebook is For:

Any company or organization actively certifying organic or for organizations looking to improve on their systems, processes, and protocols in working towards eventual organic certification will find this guidebook useful.

The reader will find that this document offers guidance for cocoa producing and cocoa trading companies, specifically. However, the same guidance for cocoa companies can be used for companies wishing to certify any number of products, though there may be some key differences. If using this guidebook for products other than cocoa such as other non-perennial or perennial crops, it is suggested to first consult a certification body or ICS consultant.

This document also offers guidance which has been based on the specific requirements of the EU Organic regulations and USDA National Organic Program (NOP). There may be further requirements for other certifications, such as JAS (Japan) and Canadian organic standards.

How it is Structured:

The first three sections of this guidebook introduce this guidebook, organic certification, and the Internal Control System, respectively. These are descriptive sections meant as an introduction to these topics with some critical information and useful references.

The next section, which comprises the majority of this document, is a sample of an ICS manual which is structured so that a company can use it as a generic example of an ICS and useful reference in constructing their own ICS and ICS manual. This section has its own sample title page, table of contents, and layout of ICS manual components in the same order of an actual completed ICS manual. As a guide, it also has text boxes with information and advice, and examples of how to fill out each component section.

How to Use this guidebook:

It is recommended that the user reads the first sections of the guidebook first to increase knowledge of organic certification and the purpose of constructing an ICS. The sample ICS manual should be used practically as guidance while creating the organizations own ICS manual. All ICS sections and annexes are provided as example outlines, but must still be developed by the organization itself.

WARNING

Using this document as an example for the development of your own ICS document does not guarantee that your internal control system will be approved by the certification body.

This document is meant to give you an idea how an ICS document may look like. DO NOT COPY IT. When you develop your own ICS, you should always start from the reality of your own situation and develop the ICS in discussion with the people who will implement it.

You should also consult with your certification body about their specific requirements for ICS and group certification. They may have standard formats for some of the documentation in your ICS.

Introduction to Organic Certification

What is 'organic'?

Organic farming is an agricultural method that aims to produce food using natural substances and processes. This means that organic farming tends to have a limited negative health and environmental in the following ways:

- It prohibits harmful chemical use
- It promotes the responsible use of energy and natural resources;
- It promotes the maintenance of biodiversity;
- It promotes the preservation of regional ecological balances;
- It leads to enhancement of soil fertility;
- It supports maintenance of water quality

Standards and regulations on organic farming are designed to provide a clear structure and rules for the production of organic goods. This is to give confidence to end consumers that their food has been produced according to organic principles, and is safe, healthy, and has had a low negative environmental impact.

Examples of regulations and standards are USDA NOP in America, and the EU Organic regulations in Europe.

What is certification?

Certification is a formal process that proves to consumers that an organization's produce meets the standards for organic production.

To be certified, the organization must set up their supply chain to meet the standards and requirements needed for organic production and trade. This involves an investment in training, setting up an internal control system, and hiring qualified individuals.

Once the organization is meeting the organic requirements and is set up to produce and trade organic products, the organization is then audited by an established Certification Body (CB).

Why certify?

If an organization is certified, they are able to say that their produce is 'organic certified' and use the logos of the EU Organic and USDA National Organic Program. This gives the buyers and end consumers confidence that what they buy and consume has been produced responsibly and that the product is healthy and has a low negative environmental impact.

International buyers pay premium prices for organic produce. There is a set premium on organic cocoa, that in 2021 was $300 USD per metric tonne above the world market price. This is a minimum, and since the demand for organic produce is so great, the prices premiums are often higher.

Market Trends and Opportunities

International organic certified markets are strongly growing and are expected to continue to grow as health and environmental concerns continue to become an increasing priority for consumers, businesses, and governments globally. This will ensure a strong and consistent demand for organic products.

Organic certification offers a strong opportunity for Liberian producers. Nearly all Liberian cocoa is produced in the absence of inorganic chemicals, making it much easier to certify organic. Farmers are also producing higher quality cocoa on their farms, and are organized into cooperative groups.

Organic certification requires an investment in money, time, and staffing. While it is predicted that there will be a strong and consisted demand for high-value organic certified cocoa, companies who are endeavoring to certify organic must calculate the costs relative to the benefits.

To learn more about market trends and opportunities for Liberian cocoa it is highly recommended to read the Premium Cocoa Market Research (Link and reference)

Introduction to the Internal Control System

What is the Internal Control System (ICS)?

The ICS is an organized system set in place by the organization so that it can achieve organic certification. It includes the organizational structure of the organic certification project and the practices and protocols necessary to achieve and maintain certification. It is one of the critically necessary components required by certification regulations. It must be described in an ICS Manual.

The ICS itself guards the integrity of the organic quality of the produce and ensures that individual farmers are trained on and are producing under organic certified conditions. The ICS also maintains a system of traceability whereby all cocoa moving throughout the supply chain can be linked back to the individual farm that it cam from. In this system, all persons who are dealing with or handling the organic produce are identified, registered, trained, and monitored on the requirements and practices for organic production. This ensures compliance to the specific organic standards in alignment with organic certification.

What the ICS is NOT:

Although it is a critical component of the organic certification process, the ICS and ICS manual is not a step-by-step guide to certifying organic. There are other key components, such as training, hiring staff, which are referenced in the manual but these processes are not described.

How – What is the ICS Manual?

The ICS Manual is the reference book for all of the activities, protocols, processes, and organizational structure of the Internal Control System in line with achieving and maintaining organic certification.

Who Uses the ICS Manual?

The ICS manual is to be housed at the company offices, ICS offices, and at producer group locations. It is to be made available for all ICS staff.

The ICS manual is the first document that Certification Bodies will ask for prior to auditing the company for organic certification. As the manual is the key document describing the certification program, it is essential that it is accurate, comprehensive, and up to date.

When should the ICS Manual be updated?

The ICS should be constructed as the organic program is being implemented. The ICS manual needs to be written at the same time, and this guidebook is to be used as a reference. The ICS is to be updated every year by the ICS staff.

Certification Bodies and ICS Consultants

Certification Bodies

Name	Website
Control Union	www.certification.controlunion.com
Kiwa BCS	www.kiwabcs-oeko.com
Ecocert SA	www.ecocert.com

ICS Consultants

Name	Contact Name	Email	Phone
Afri-Safe Standard Limited	Stephen Acheampong	services@afrisafegh.com	+233508766501/+233279293289
Jula Consultancy Ltd	Mohamed C. Fofanah	consultsjula@yahoo.com	+23288887176/+23276689200
Pro-Environmental	Joseph K. Agbagah	elikemagbaga@yahoo.com	+233208207090/+233248156380
So-B Green	Charles Tellier	c.tellier@sobgreen.com	+34693690696/+233266255519

[Company Logo]

[Company Name]
ORGANIC COCOA CERTIFICATION

Internal Control System (ICS) Manual Example Guide

[Version Number] – [Date]

[Company Contact Information]

ICS Manual Table of Contents

The ICS Manual should always begin with a clear table of contents denoting all sections, sub-sections, and appendices of the manual. This allows the ICS team and inspectors/auditors easy access to all pertinent information.

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List of Tables:

Abbreviations

There should be a list of all of the acronyms used in the document so that the reader or certification body auditor will have a reference. See below for an example:

Abbreviation	Definition
ASC	Approval and Sanctions Committee
CB	Certification Body
CDA	Cooperative Development Authority
CEO	Chief Executive Officer
EU	European Union
GAP	Good Agricultural Practice
GEP	Good Environmental Practices
GSP	Good Social Practice
GMO	Genetically Modified Organism
Ha	Hectare
ICPM	Integrated Crop and Pest Management
ICS	Internal Control System
IPM	Integrated Pest Management
LF	Lead Farmer
NOP	National Organic Program (USDA)
OSP	Organic Systems Plan
PA	Purchasing Agent
VC	Village Coordinator

Summary

Project Summary

Write a brief description of the Organic Certification Project.

Example:
[Company Name] exports organic cocoa beans, sourced mainly from smallholder organic agricultural producers. The company has been purchasing, aggregating and trading conventional cocoa beans since [date]. Recognizing benefits of added value and responding to international market trends, the company is investing in certifying USDA NOP and EU Organic for a their supply chain….[Describe briefly]

The ICS

Describe a summary of the ICS system, what it is and why it is important.

Example:
The Internal Control System (ICS) is a system that guards the integrity of the organic quality of the product, maintains the individual farms under organic certified condition and ensures the traceability of products going for export. It is a system in which all persons dealing with the product (farmers, aggregators, staff, subcontractors) are identified, registered, instructed on the requirements and practices for organic production to ensure compliance to a specific organic standard, in alignment to organic certification. The activities of these persons are monitored in a system of regular visits and documentation. The persons involved are made aware of their common responsibility for the product. The final responsibility for the implementation of the Internal Control System lies with the ICS Team, who all have their roles and responsibilities. The personnel involved receive training to perform their duties.

This Internal Control System shall undergo regular review and improvement to reflect quality improvement capacity of the small holder farmers and the Internal Control System's staff.

The ICS Manual

Describe the manual itself and its purpose:

Example:
This document is a compilation of working instructions and forms used to maintain the Internal Control System of LCC's Organic Certification project. It describes the responsibilities of each level in the project. It aims to provide for transparency that is clearly documented so that the external inspection can easily understand and evaluate the functioning of the system.

Where a resource or form that is used in the ICS is not included in this manual, a description of where that resource or form can be found is described.

Certification

A brief statement on certification and approval.

Example: The organization and producers shall be approved for certification based on independent verification from a certification body (CB) approved and accredited by EU/NOP certification schemes.

1. Introduction

1.1 About the Operator – [Company Name]

This section describes the "operator" – that is the company that holds or will be holding the certification. This company is usually an exporter, commercial farm, or could be a cooperative itself. In this section describe:

- The history of the company
- Legal status
- Key business functions and a summary of how they work
- Area of operations
- Key management and staff
- Core activities as they relate to the organic certification project

1.2 About the Cocoa Producers

This section describes the cocoa production. If cocoa is sourced from farmer groups or cooperative societies, these groups must be described here:

- The history of the cooperatives
- Legal status
- Number of farmers
- Summary of training of farmers on GAP, organic standards, internal inspection, and approvals and sanctions.
- Cocoa harvest and post-harvest procedures
- Farmer number and communities (See table 1 below)
- Yield Estimates (See table 2 below)

Example:
[Company Name] sources their organic cocoa beans from [Name of Farmer Group] in [Location]. This organization is registered with the Cooperative Development Authority (CDA) as a legal entity in Liberia. The cooperative has a membership of [Number] registered farmers.

These farmers are given extensive training on organic good agricultural practices, on the internal organic standard, on traceability, and on sustainability. The management team of the cooperative are integral in the management of the ICS in the rural areas, and monitor internal inspections, approvals and sanctions, trainings, and traceability. The constitution and by-laws of the association and the registered list of farmers are housed and available for viewing at [Name of Farmer Group] office, [Company Name] office, and upon request. See a summary of farmers and farming locations below in Table 1.

Table 1 Overview of Locations of Smallholder Farmer Communities

Name of Cooperative	***Name of Community***	***Number of Farmers***
TOTAL		

The farmers typically own [Number] hectare (Ha) of land. The smallest farmer has [Number] ha of cocoa and the biggest has [Number] ha.

Table 2 Yield and Yield Estimates

		2018	2019	2020	2021 Estimate
A	*Average Yield (Kg/Ha)*				
B	*Average Productive Area per Farmer (Ha)*				
C	*Average Yield Per Farmer (A X B)*				
D	*Number of Farmers*				
E	*Total Yield (MT) (C X D / 1000)*				

The farms are managed mainly by family members with the help of seasonal workers during the heavy GAP working periods and cocoa harvest period.

The cocoa is produced with cultural GAP methods. Productivity and quality cocoa are produced by using proper farm management, harvest, and post-harvest practice, and in the absence of using synthetic chemicals. Proper underbrushing, weeding, pruning, shade management, disease and pest control ensure healthy and productive trees. Proper harvesting procedures, pod breaking, sorting, fermentation, drying, storage, and transport and handling ensure cocoa is of the highest quality standard. Examples of GAP manuals used in farming communities are housed at [Name of Farmer Group] office, [Company Name] office, and are available upon request.

The main harvest season is from [Months of the Year of Harvest Season], with a smaller harvest in [Months of small harvest season]. Farmers sell most of their cocoa to [Company Name]. Production levels of the farmers are estimated and recorded. Under the ICS organic program, all production is recorded and compared to annual yield estimates.

1.3 Overview Map

A map of the organic production area must be included or referenced. Ideally this shows individual farms and is mapped out using GPS coordinates. The map can also be drawn out on existing topographical or geographical maps.

The map must:

- Show cropping areas (farms) with field numbers or other identification
- Show storage facilities
- Indicate and describe each boundary (dirt road, paved road, ditch, fence, tree line etc.) and buffer zones
- Show names of adjoining roads. If not located on a public road, indicate direction of nearest road and distance.
- Show and describe land uses, especially of neighbouring farms if using inorganic or prohibited substances
- Show all landmarks such as railroad tracks, buildings etc

1.4 The Organic System Plan

Certification bodies require a separate “Organic Systems Plan” (OSP) which is a form that is can be obtained from any Certification Body and filled out by the operator. Here the Organic Systems Plan must be referenced.

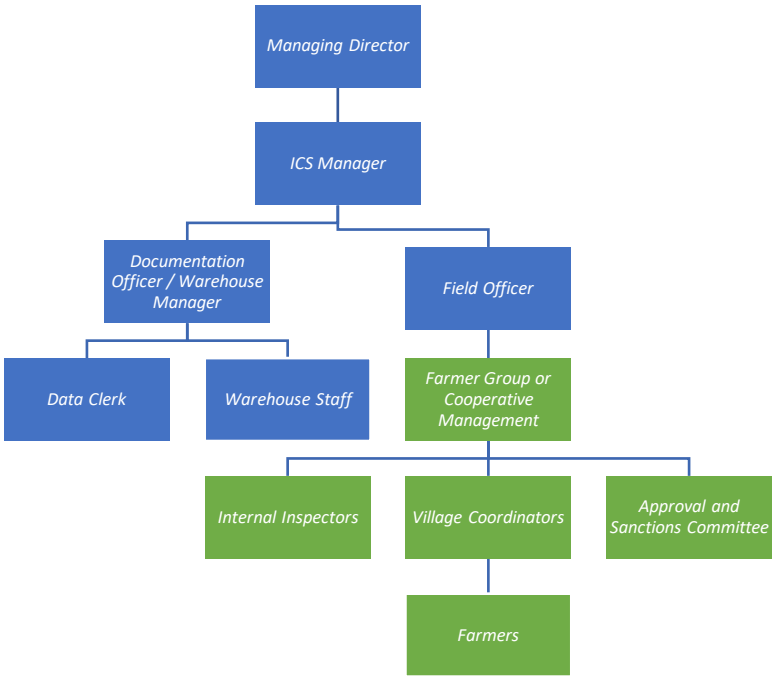
Example:
Technical details of the organic system relevant to this program are described in detail in the Organic Systems Plan (OSP), which will be made available at the ICS Office.

2. Organization of the ICS

2.1 Organizational Chart

Describe the hierarchical structure of the organization and the farmer group as it pertains to the ICS structure. This is best done using an organizational chart structure:

Example:



2.2 ICS Staff, Responsibilities, and Qualifications

In this section the key roles of the ICS, as laid out in the organizational chart above, must be described. The key positions, the name of the staffs, and their responsibilities and qualifications should be described. Key roles that must be described are:

- Leader of the organization (CEO or Managing Director)
- Leader of the ICS – The ICS Manager
- Data Clerks or Documentation Officers
- Field Officers
- Warehouse Staff
- Farmer Group or Cooperative Management
- Internal Inspectors
- Village Coordinators or Lead Farmers
- Approval and Sanctions Committee

Example:

Table 3 ICS Staff, Responsibilities, and Qualifications

Position	***Name or Number***	***Responsibilities***	***Qualifications***
[Company Leader]	*[Name]*	• *Act as the Certification management representative* • *Represents the group before third parties* • *Signs contracts with the certification body and subcontractors* • *Revises and approves ICS documents periodically* • *Communicates with the certification body*	• *Detailed knowledge of the EU/NOP organic rules and regulations* • *Leadership and organization skills in developing and motivating a team* • *Detailed knowledge of the traceability system* • *Excellent international communication skills* • *Contracting and negotiation skills*

		• *Coordinates external inspection with the certification body*	
ICS Manager	*[Name]*	• *Coordinate all training activities of producers* • *Designs and implements ICS of the company* • *Leads in maintenance of records for ICS* • *Leads in maintaining traceability system of the company* • *Assesses the entry approval for new producers* • *Follows-up on sanctions*	• *Detailed knowledge of the EU/NOP organic rules and regulations* • *Good knowledge of the ICS procedures, documents, and the requirements of the external certification body.* • *Good data entry and data management skills* • *Ability to train and motivate staffs and producers.* • *Good team management and administrative skills.*
Documentation Officer / Warehouse Manager	*[Name]*	• *Ensures that certified cocoa always remains strictly separate from uncertified cocoa both at the community level and warehouse level.* • *Ensures that signs, labels, or tags of Organic certified are visually displayed on doors, bags and pallets for easy identification of certified cocoa.* • *Assists in documenting records on;* • *Purchases and sales of certified cocoa.* • *Purchases and sales of non-certified cocoa.* • *Carry over stock of certified cocoa of previous season.* • *The sales invoices stating the certified status.* • *Maintains traceability system and digital farmer database*	• *Detailed knowledge of the ICS and the ICS procedures* • *Should be able to understand and explain the traceability system of the company* • *Basic data entry and data management skills* • *Should be able to keep records of cocoa received from producers to the warehouse and from the warehouse to the final takeover center.* • *Good computer and data entry skills*
Data Clerk	*[Name]*	• *Supports the documentation officer* • *Supports the maintenance of the ICS documentation* • *Keeps the office organized and records/documents current and accessible* • *Records incoming cocoa* • *Ensures no cross-contamination of cocoa in the record keeping* • *Assists in maintaining farmer lists and traceability*	• *Good knowledge of the ICS and the ICS procedures* • *Is able to understand and explain the traceability system of the company* • *Basic data entry and data management skills* • *Very good organizational skills* • *Good computer and data entry skills*
Field Officer	*[Names]*	• *Purchase of cocoa from farmers and farmer cooperative* • *Weigh the cocoa, fill out receipts, and transport cocoa* • *Maintains traceability record between agent and farmers and farmer cooperative* • *Verifies and ensures cooperatives are recording traceability documents* • *Spot check on ICS system functioning in cooperative and rural communities*	• *Knowledgeable of ICS and organic standard* • *Should be able to understand and explain the traceability system of the company* • *Basic written data entry and form filling skills* • *Diligent with keeping receipts and records, detail oriented* • *Ability to speak the local language and understand the customs of producers.* • *Ability to work for long periods in, and to travel within rural communities* • *Trustworthy and credible* • *Should be able to keep records of cocoa received from producers to the warehouse and from the warehouse to the final takeover center.*
Cooperative Management	*[Names]*	• *Aggregates cocoa from farmers at cooperative warehouse* • *Dries cocoa in solar driers* • *Stores cocoa according to GAP and organic standard*	• *Knowledgeable of ICS and organic standard* • *Should be able to understand and explain the traceability system*

		• *Knowledge hub for GAP and organic standard for cooperative farmers* • *Trains VCs in GAP and organic standard* • *Spot check on ICS system functioning in cooperative and rural communities*	• *Proficient at GAP and the organic standard* • *Excellent written data entry and form filling skills* • *Diligent with keeping receipts and records, detail oriented* • *Ability to speak the local language and understand the customs of producers.* • *Should be able to keep records of cocoa received from producers to the warehouse and from the warehouse to the final takeover center*
Internal Inspectors	*[Names or Reference a List]*	• *Inspection of farms for registered producers to assess compliance with organic principles.* • *Interviewing producers to assess compliance with the certification standards/regulations.* • *Producing timely and accurate reports on internal inspections and farmer interviews.* • *Following up on non-compliance identified during internal inspections*	• *Ability to speak the local language and understand the customs of producers.* • *Ability to read, write and produce reports in the favored language of the certification body.* • *Knowledge of local/regional agricultural systems (experience in cocoa production).* • *Technical and social know-how of principles and practices of organic certification.* • *Demonstrable competence in control procedures and internal standards.* • *No conflicts of interest that would compromise the integrity of the role.* • *Respected by producers*
Village Coordinators	*[Names or Reference a List]*	• *Acts as resource person for the company at the community level and trains producers on GAP and organic principles* • *Assists other producers to understand the internal standard of the district* • *Monitors post-harvest handling activities of other producers to ensure that certified cocoa is not mixed with uncertified cocoa* • *Assists producers to keep records of their activities* • *Serves as agent for receiving complaints and grievances from registered farmers* • *Interprets and aid aggrieved producers and workers to effectively file their complaint form for onwards submission to the Approval and Sanction Committee. See annex 1 for a complaint form* • *Prepares weekly reports on complaints received and redress action taken by the Approval and Sanctions Committee*	• *Ability to carry out local facilitation and training of producers.* • *Ability to read and write.* • *Good knowledge of the internal standards.* • *Should be respected by both the farmers and the ICS staff*
Approval and Sanctions Committee	*[Names]*	• *Internal approval and sanctioning of producers according to the EU/NOP organic production principles* • *Decisions on accepting, suspending, or excluding farmers or on corrective actions from farmers.*	• *Good knowledge of the internal standards and should be respected by producers and the staff* • *Excellent knowledge of the approvals and sanctioning policies and procedures*

2.3 Training for the ICS

ICS requires training of office staff, warehouse staff, farmer groups, internal inspections, approval and sanctions committees, and farmers. The training must be briefly summarized in this section, including the frequency of the training and who is responsible for the training. Documentation of trainings must also be noted.

<u>Example:</u>
For ICS staff and farmers, training will occur as follows:

- *ICS staff will undergo refresher training once a year on the ICS system and on changes to the EU rules and regulations or the NOP norms. Training shall be conducted by an expert who has technical knowledge on ICS set-up.*
- *All VCs shall be trained yearly on GAP, GEP and EU/NOP organic production principles in cocoa. This training shall be conducted by an expert who has technical knowledge in organic/cocoa production.*
- *All Internal Inspectors should be trained at least once a year. The training shall include sample field inspections and interview with other farmers within the group*
- *Farmers are yearly trained on GAPs, records keeping and the EU/NOP principles of cocoa production. Training shall be provided to farmers by the Village Coordinators and Tree Crop Officers, or any other personnel qualified and identified by the group.*
- *All subcontractors and persons who handle organic cocoa are trained yearly on organic agriculture and the EU/NOP rules and regulations/norms with emphasis on traceability*
- *New staff, farmers, cooperative staff, or VCs will be trained as soon as there are hired with all of the pertinent information necessary for their role*

All training events shall be recorded and centrally filed at the ICS office using the training attendance form (see [Appendix]). The training record must contain at least the topic of the training, date, place and list of trainees and their signatories. Reference to training documents, other training content, important outcomes etc. should also be noted.

2.3.1 Training Material

A list of the training materials used for the above trainings must be referenced with clear direction on where this material is housed within the ICS system.

Example:
Training Material can be found housed at the ICS Office and is available by contacting ICS Management.

Table 4 ICS Training Material

ICS Level
• *Conducting Risk Assessment* • *Constituting the ICS Team* • *Facilitation Skills* • *Introduction to Certification* • *Introduction to ICS* • *Objective of ICS and Continuous Improvement* • *Organic Farming* • *Record Keeping* • *Steps to Certification* • *Traceability* • *Waste Management*
Internal Inspection
• *Internal Inspection Training* • *Internal Inspection Checklist Training*
Farmer Training
• *Farm Management* • *Harvest and Post-Harvest* • *Traceability*

3. Organic Standard

3.1 Standards and Regulations Referenced

The ICS manual must reference organic regulations that are internationally recognized. For this manual, we specifically reference the EU Regulations on organic agriculture and the USDA National Organic Programme (NOP). These regulations are critical, as they form the basis for the internal organic standard that the company, producer groups, and farmers must follow to comply with organic certification regulations. The ICS management must familiarize themselves with these regulations. This section should briefly reference the regulations that form the basis of the internal organic standard (section 3.2), and have a link to the regulations themselves.

Example:

LCC, Vornambeh Cooperative, and their farmers are working according to the following regulations and standards:

- *EU Regulation 2092/91 (all farmers)*[1]
- *EU Regulation 2018/848 (all farmers)*[2]
- *EU Regulation 2020/1693 (all farmers)*[3]
- *USDA NOP Regulations (all farmers)*[4]

[1] *https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A31991R2092*
[2] *https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018R0848*
[3] *https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020R1693*
[4] *https://www.ams.usda.gov/rules-regulations/organic*

3.2 Internal Organic Standard

The internal organic standard is a summary of the organic regulations to be implemented with farmers, farmer groups, and throughout the company. This standard is the critical element of all of the organic training for the entire ICS system, as well as for internal inspections. It will be analyzed by the certification body auditors, and as such is very important. The organic standard should be developed in consultation with a professional expert and/or in alignment with the organic regulations referenced in section 3.1.

Example:

The table below gives insight on the various components of organic production and what is required by the ICS internally to be EU/NOP organic compliance:

Table 5 The Internal Organic Standard

Component	***Standard***
Conversion Period	• *The farm should be prevented from exposure to and application of inorganic chemicals for 3 years before the inspection for organic certification*
Production Sites	• *All production sites for cocoa production should be declared and registered as part of the project* • *All sites must be converted to organic including crops for consumption within the same organic plots* • *Clearing of protected or demarcated forest zones/ecosystems and burning for production purposes is prohibited* • *Buffer zones should be created between production sites and water bodies to prevent pollution or drifting*
Prevention of Contamination	• *A buffer zone should be created in situations where organic farms is sharing boundaries with conventional farms* • *A buffer zone shall be 10 meters wide should be clearly marked and and protects the farm from pesticide drift*
Use of Inputs, Seeds, and Planting Stock	• *The use of GMOs is prohibited for organic production* • *Seeds and planting stock/seedlings must originate/ be produced under organic principles* • *Second-generation seeds can used in situations where organic seeds are not available in country (In situations where seeds/seedlings are not organic at first use but reproduced under organic production principles)* • *Use of synthetic/prohibited substances stated under the EU/NOP rules and regulations and norms (plant protection products/fertilizer) is prohibited for use in organic production* • *Tools and equipment used for production/processing/transportation of cocoa beans must be free of contamination*

	• *Only manual means of weed control is allowed. No use of chemicals for controlling/killing weeds*
Soil and Water Protection	• *Sewage sludge or biosolids are prohibited for fertilizing organic farms* • *Soil conserving practices must be used by producers to improve soil fertility. This includes the use of cover crops, mulches, spreading of cocoa husks, etc* • *Measures should be in place to prevent soil erosion in organic farms* • *There should be systems in place to ensure raising of shade in farms where there are none* • *Compost can be used to improve soil fertility*
Product Flow and Traceability	• *There should be a clear product flow at all levels to ensure organic produce maintains its quality* • *There should be documents in place to monitor flow of products at all levels of the supply/value chain* • *Organic produce should be separated from conventional produce at all levels from harvesting till the point of sale* • *Products should be labelled and identified as organic* • *No prohibited substances may be used to control pest within storage facilities for organic cocoa*

3.3 Risk Management

A risk assessment must be conducted by the ICS management or an external consultant during the establishment of the ICS and updated every year afterwards. The risk assessment should take into consideration any factors that could compromise the organic integrity of the organic programme at any level.
This risk assessment should be housed in the ICS Manual as an appendix. An example of a risk assessment can be found in the appendices of this document.

Example:
A participatory risk assessment was conducted during the establishment of the ICS. The farmers considered risk as existing behaviour in the organic farm or in the community that can compromise the organic integrity of the programme.

See [Reference the appendix of the risk analysis] for the results of the participatory risk assessment. The participatory risk analysis with the farmers is repeated every year during the internal mock audit [Reference the section describing mock audit – Section 4.3 in this guide] and subsequently [Reference the appendix of the risk analysis] is updated with the latest results.

The ICS team also conducts yearly risk assessments for the harvest-to-export stages in the supply chain, see appendix 1.

3.4 Measures to Address Risks

In this section, measures to address risks flagged in the risk assessment must be described by the ICS team. One of the critical functions of the internal inspectors is to note risks and non-compliances and to communicate these to the ICS team. Risks are also mitigated via training farmers on organic principles and internal organic standards. Training is conducted by agronomists, field officers, and village coordinators.

Example:
In order to mitigate risk and improve on the organic system, internal inspection will be conducted one time per year on every farm parcel that will be under the certification program, and one times at the cooperative warehouse, aggregation points, and central warehouse. The internal inspection will give special attention to the critical control points identified during the yearly risk analysis.

The field officers, tree crop officers, and VCs will conduct periodic agronomic training for all the farmers in order to improve upon their organic farming activities and the field officers will conduct periodic training on record keeping. When necessary, cooperative staff and village coordinators will assist the farmers in record keeping.
The training programme is adapted after each yearly risk analysis.

4. ICS Procedures and Policies

4.1 Commitments to the ICS and Organic Standards

In this section the company, farmers, and their farmer groups commit to upholding the organic standards in accordance to the ICS policy.

Example:

4.1.1 Commitment as a Company

[Company Name] is committed to improving the livelihoods of its farmers and this can be achieved through the observation of best management practices, good social practices and the adoption of environmentally friendly farming practices that will result in environmental conservation and improved economic wellbeing of its farmers. LCC is committed to achieving this objective by subscribing to the EU/USDA NOP rules and regulations/norms.

4.1.2 Commitment of Farmers/Producers

Farmers have expressed their interest to partake in the organic EU/NOP certification program. They have subjected their farms to the program by registration, and signed a contract with the ICS set up to adopt the use of organic production principles.

4.1.3 Commitment of Staff

[Company Name] aims to be successful and continuously improving in the adoption of the EU/NOP Organic principles. For this reason, importance shall be attached to training and the proper use of resources by the ICS staff. [Company Name] will build and strengthen the capacity of farmers to fully participate in the certification activities by performing key functions such as training, internal inspection, approval and sanctioning of group members in the certification process.

4.2 Registration of New Farmers

4.2.1 Farm Register and Yield Estimates

When farmers enter the organic certification programme they must be registered within the ICS. The ICS team must register the farmers using a farmer register form. This information captures, among other information, the farm details and previous yields of farmers, so that the ICS team can calculate an estimate of the expected yield. This is critical for the certification process, as certification bodies must know how much organic produce is estimated to come from this specific organic system. This section describes the process of registering new farmers.

Example:

The Farmer Register Form will be filled in by the internal inspector to capture essential information such as yield estimates and status of buffer zone with adjoining farms [Reference the Appendix of the Farmer Register Form]. On this form each farmer gets a unique code number.

Each farmer should have a farm located and drawn on the farm map.

All members joining the association should be those who believe in organic farming. Until otherwise allowed by the certification body, all farmers/ members shall go through a conversion period of three years. Within this period, the farmers shall practice organic production methods. There shall be an internal inspection for all those going through the conversion period.

The yield estimate of every farm parcel under the organic program is captured during the completion of the Farm Register Form. However, actual yields are recorded during the harvest periods and with that knowledge the yield estimates are updated every year. The yield estimate calculation methodology can be found in [Reference an appendix that describes the yield estimation calculation].

4.2.2 Contract

Once farmers are registered with the ICS they must sign a contract with the company stating that the farmer agrees to comply with the internal organic standards, and that the company will provide a market for the organic produce. The contracting process is described in this section.

Example:
After the ICS manager accepts the new farmer based on the information in the Farm Registration Form, the farmer and [Company Name] sign a contract.
Through this contract the farmer agrees to comply with the organic principles and the internal organic standard and to participate in the Internal Control System. [Company Name] commits to organize the ICS and to endeavor to find a market for and to buy the organic products through a transparent price setting procedure. See Appendix 6 for the sample of the contract. The signing of contract should be witnessed by a member of the ICS staff.
With the signing of the contract the farmer agrees with the contents of this form. To make sure the farmer understands the documentation, the information is read out when the farmer is illiterate and a third person who can read and is trusted by the farmer is witness of the signing of the contract and co-signs the contract.

4.3 Self-Assessment and Internal Mock Audit

Self-assessments and mock audit are done to measure the compliance level of the ICS and organic certification program as a whole. It comes in two types. Inspection at the farmer level and a general inspection done by an external person/group to ensure the program is implementing all policies and procedures stated in the ICS manual towards certification. In this section these processes must be described.

4.3.1 Internal Inspection

Internal inspections are an inspection of individual farmers to determine compliance with EU/NOP regulations and the internal organic standard. The tool used by internal inspectors is the "Internal Inspection Report Checklist" which is a form that inspectors use during inspection. Internal inspection procedures should be described in this section, including which farmers are inspected, and how often.

Example:
The internal inspection is an assessment of individual producers to ascertain their level of compliance to the EU/NOP Organic rules and regulations and the internal organic standard. It is both on-farm and off-farm inspection using the EU rules and regulations, or internal inspection checklist (Simplified EU/NOP rules and regulations/norms) developed by the ICS. [See Appendix where the form is located]

The Internal Inspection is executed by the Internal Inspector of the ICS. Every farmer should be present during the Internal Inspection.

- *Each registered producer shall go through an internal inspection at least once a year based on the EU/NOP organic rules and regulations checklist in its valid version*
- *There be an internal inspection at the cooperative warehouse and central warehouse one time in a year. This inspection will offer staff at the unit an opportunity to improve upon their performance and processing*
- *All rules and regulations/norms to be adhered to shall be inspected in full*
- *The Internal Inspector shall produce an Internal Inspection Report using the standard form [Internal Inspection Report Checklist Appendix where the form is located]*
- *A team made up of producers and other members of the ICS shall review all inspection reports and make recommendations on corrective actions and status of producers as spelt out in the ICS manual*
- *Non-compliances and corrective actions shall be identified and written in a form. Inspected farms/farmers shall conduct corrective actions within seven (7) working days*
- *Internal inspector shall meet all the qualifications stated in the section of Responsibilities and Qualifications of personnel/ICS staff*
- *New producers shall be internally inspected prior to their entering into the organic producer register*

- *Internal inspector shall not conduct internal inspection of his/her own farm to avoid conflict of interest*

4.3.2 Internal Mock Audit

The mock audit is a process whereby the ICS team can inspect its own procedures prior to the formal certification audit. This can be conducted by a third party who is not affiliated with the company but is familiar with organic norms and regulations. The mock auditor inspects the company's standards and procedures, noting non-compliances in the same way that a formal organic certification body would. In this way the ICS can self-assess prior to the formal certification audit process and correct any issues that may be detected. The mock audit procedures are described in this section.

Example:

This is an internal audit which is conducted by an person/group contracted by the company and not affiliated and with no conflicting interest with the company. The aim is to assess the level of compliance of the company and its producers towards the EU/NOP organic rules and regulations/norms. This shall be done after internal inspection is being carried out. LCC shall always call for an internal audit at least once per year to assess the level of compliance of its producers. This shall be done based on the EU/NOP organic rules and regulations/norms checklist in its valid version.

- *The internal auditor shall produce a report on the internal audit.*
- *Non-compliances and corrective actions shall be identified using the standard form. The ICS manager shall conduct corrective actions within fourteen (14) working days depending on the severity of the non-compliance*
- *Internal auditors shall not be the same person as the ICS Manager, who has developed the ICS for the management of the group*

4.4 Approvals and Sanctioning

The internal inspection and mock audit will lead to either approval of farmers and the comapany, or sanctioning due to violations or non-conformities. The procedure for approvals and sanctions should be described in this section. Approvals and sanctions are performed by the Approval and Sanctions committee, which is independent of the internal inspectors. This committee reviews the reports of the internal inspectors and mock auditors, and determines whether farmers or the company/group are approved or if sanctions must be put in place. See the below example for a guide on how to construct approval and sanctioning procedures.

Example:

Approval and sanctioning shall be done by the Approval and Sanction Committee at the ICS Office. The committee shall convey approval meeting to review the internal inspection report and decide to either approve or sanction producers according to the rules and regulations of the group. The committee shall document all decisions and elaborates the list of approved and sanctioned producers. It shall report the results of the internal inspection to the respective producers, their Village Coordinators, the ICS office as well as the external certification body.

4.4.1 Approval Procedure

Approval of producers of the company/group shall take place at the ICS level after carefully reviewing the reports of the annual internal inspection reports. This shall be done during a meeting of the Approval and Sanctions Committee where approval of producers shall be determined objectively. Whether a producer can conduct corrective actions or not, if a producer is able to carry out all the corrective actions related to him or her, then he/she is approved for organic certification.

4.4.2 Sanctioning Procedure

During internal inspections, any failure noted as not complying with the EU/NOP organic rules and regulations shall be treated as a non-compliance and results in sanctions which shall be meant to correct these failures. All sanctions and subsequent corrective actions and decision-making processes shall be recorded. Any suspension and cancellation issued by the ICS shall be notified immediately to the certification body. The Approval and Sanctioning Committee shall make a final decision on sanctions to be applied. Three types of sanctions shall be applied to non-

compliances of organic principles and to contractual issues. These are; (1) warnings; (2) suspension; and (3) cancellation.

4.4.2.1 Warning

Non-compliance of any EU/NOP rules and regulations/norms/internal organic standards limited to prohibited substance used shall lead to a warning. The maximum time allowed for correction shall be seven (7) working days and this shall vary depending on the level of non-compliance. In the case where the warning remains unresolved by the end of the seven (7) working days period or days given by the Approval and Sanctions Committee, suspension shall be imposed.

4.4.2.2 Suspension

Suspension shall be issued when a producer fails to show sufficient corrective action after a Warning has been issued. The maximum period of suspension shall be seven (14) working days. During the period of suspension, the producer shall be prevented from using any type of document that has any relation to organic rules and regulations/norms. Suspensions shall be lifted once there is written / visual evidence that the cause has been resolved.

4.4.2.3 Cancellation

Cancellation of the contract shall be issued when the ICS detects the producer's severe mismanagement on EU/NOP organic rules and regulations/norms (use of prohibited substances) related procedures, fraud and bankruptcy of the producer, or when the producer does not show sufficient corrective action after the period of suspension. Any producer that has had a cancellation sanction applied may not re-submit for registration to the group for three years. Cancellation of the contract shall result in the total prohibition of use of any document that has any relation to organic certification and produce shall not be sold as organic produce. This farmer will need to go through all annual internal inspections and will have to undergo the conversion period of three years if prohibited substances are used. Afterwards, the Approval and Sanctions Committee will further decide and approve the farmer or farms as organic certified.

4.5 Complaints

A procedure for registering and administering complaints from farmers, producer groups, staff, or anyone affiliated with the ICS system must be described. This promotes detection of violations, but also gives an avenue for all ICS members to have a voice when any unfairness might occur.

Example:

When the group receives a complaint, the details of the complaint, causes of the problem and actions taken shall be recorded appropriately. See [Appendix of the complaint and violation form]. The following action must then take place:

- *The cause of the problem that led to the complaint shall be investigated, and remedial actions shall be taken.*
- *The procedure recorded in the form shall be communicated to the customer or concerned person.*
- *When a producer is not happy with the decision of the approval and sanction committee, he/ she shall seek redress through the ICS Manager that is, if he/she is not part of the approval and sanction committee.*
- *Complaints received and actions taken shall be evaluated during ICS management meetings.*
- *Any other complaints related to workers of the group shall follow the same system for the problem to be addressed*

4.6 Subcontractors

If the company hires any subcontractors at all, be they private sector, donors, or governmental, they must have a contractual agreement stipulating that the subcontractor will comply with the organic standards and that subcontracting activity will not compromise organic production or the ICS. The policy on subcontractors is described in this section.

Example:

The company shall always rely on its territorial recognized agricultural institutions with technical knowledge in cocoa production to conduct agronomic activities or other services related to organic production. Where the expertise does not exist within the company, it shall subcontract a third party to conduct the needed services. The competency of the subcontractor to comply with the relevant EU/NOP organic principles shall always be assessed in advance.

The company or group members who subcontracts a third party shall have a documented contractual agreement to ensure activities does not compromise the Company's/Group's objective towards EU/NOP organic compliance. Subcontractors shall be expected to abide by the Group's ICS and the compliance shall be inspected by the ICS Manager at least once a year.

4.7 Environmental Conservation

The ICS manual may include a section on environmental conservation to buttress the internal organic standard and to give clearer direction to the ICS staff, to producer groups, and to farmers. Waste management, pollution management, resource conservation, and soil management and fertilizer use should be described.

Example:

4.7.1 Waste Management

- *Site (warehouse/farms) shall be kept clean, free from waste*
- *Diseased pods and plants shall be buried deep into the soil for decomposition outside the farm*
- *All plastics waste (water sachets, snack packages, rubber bags etc) and papers/ cardboard shall be collected in a garbage bin and dumped into a designated waste site/pit. Waste pit shall be fenced*
- *Where not possible, this waste shall be disposed at the community refuse dump*
- *Pruned branches and empty cocoa pods shall be allowed on the soil to decompose to fertilize the soil*
- *Producers shall plant shade trees (at least 8 trees per acre) on their farms to protect the soil from depleting*

4.7.2 Pollution Source Management

- *Producers must not use synthetic pesticides or fertilizers on organic farms. They shall follow the principles of IPM and shall prevent diseases and pests wherever possible.*
    - *Upon regular monitoring of pests and diseases, they shall only use organic pesticides as the last resort*
    - *Producers shall use only organic fertilizer/compost to improve soil fertility when the need be*
- *Organic pesticides and fertilizers shall be stored in a storage that meets the criteria stated in Health and Safety Policy of this document.*
- *Mixing of approved organic pesticide shall be done at least 50 meters away from water sources, such as rivers, ponds and wells*
- *Before spraying approved organic pesticide, neighbours shall be informed at least a day earlier, and warning signs shall be visibly displayed on sprayed farms.*
- *Local warning signs such as the use of red cloth will be used for such purposes*

4.7.3 Natural Resource Conservation

- *When a site is not used for production, it shall be managed as conservation area for fauna and flora*
- *Producers shall encourage growth of shade trees (at 6-7 trees/Acre) in their cocoa farms to enhance biodiversity*
- *Burning will not be used for land preparation when starting a new farm*
- *Producers shall not burn bushes and forests around their farm*
- *Water-logged area, such as marshes and swamps, shall be managed as conservation area where possible*
- *Mixing point of organic inputs shall be far away from water bodies, such as rivers and wells*
- *Producers shall not farm very close to any river/stream/waterbodies*

4.7.4 Soil Management and Fertilizer Use

- *Healthy pruned branches and broken pods are left on farmers plot to decompose and fertilize the soil*

- *Cultivation techniques to prevent soil erosion shall be encouraged on farms*
- *When organic manure is to be used, risk assessment shall be conducted to identify the risks and corrective actions to be taken to ensure there are not residue of prohibited substances in the manure*
- *Producers shall buy organic fertilizers from recognized certified fertilizer sources and keep invoices of purchase*
- *Fertilizer stock inventory shall be maintained each time organic fertilizer is bought or used*
- *Producers shall keep application records at each application*
- *A policy of cautious organic fertilizer use and application shall be practiced where the needs of the crops are taken into account as well as to maintain and enhance soil fertility*

4.8 Plant Protection Products

This section describes how plant protection products can and cannot be used in alignment with the organic specifications and regulations. These should be clearly laid out and a list of approved and prohibited substances should be referenced in the appendices. The storage practices should also be described. This adds support and clarity to the practices needed to adhere to the internal organic standard.

Example:

4.8.1 Application of Plant Protection Products

The group's pesticide policy is:

- *No use of non-approved synthetic pesticides and instead adopting IPM practices*
- *Use only organic pesticide that have been approved to control the target pest/disease and are purchased from a reputable certified supplier*
- *All persons handling organic pesticides shall be trained on handling and safe use of pesticides*
- *Producers shall document and report on all organic approved pesticides applied in the farm*
- *Producers shall adhere strictly to safe use of organic approved pesticide to ensure safety*
- *Routinely monitor pests and diseases.*
- *IPM principles that shall be adopted include:*
    - *Prevention to limit or prevent the initial pests and disease infestation*
    - *Routine observation/monitoring to assess how well plant is growing*
    - *When any abnormality is observed on farms, members shall identify the cause of the problem*
    - *Members shall assess the level of damage (Diagnosed) of the problem to their farms*
    - *Members shall then decide when and what actions need to be taken to control the pest or disease on the farm*
- *The group shall keep the current approved/prohibited pesticide/substances used in EU/NOP organic production. The group is aware of the banned list of pesticides/substances.*
- *Under no circumstances shall any group's producer use pesticides/substances contained in the banned list for cocoa cultivation. Only those products in the updated approved pesticides/substances list shall be stocked for use.*
- *Approved EU/NOP organic pesticides/substances shall only be used for their intended crop and pest*

4.8.2 Storage of Plant Protection Products

Every producer of the group shall be encouraged to have his/her own organic fertilizer and chemical/substances store. Organic fertilizers and crop protection products shall be stored and protected from the weather in a sound, secured, clean, dry concrete floor, protected from rodents and able to prevent spillage.

- *Organic fertilizers shall be stored separately from pesticides, packaging materials and cocoa beans at all times.*
- *Updated organic fertilizer stock inventory shall be kept at all times*
- *The storage area shall be ventilated and well-lit so that one can read the labels*
- *The fertilizer storage area shall be clearly marked with warning signs*
- *The entrance to the storage area shall be lockable*
- *An emergency procedure shall also be displayed, and workers shall be trained to follow it.*

- *Crop protection products shall be stored away from protective clothing, produce and any other materials*

5. Document Flow and Control

5.1 Organization of Documents

The ICS houses and maintains many documents, and therefore the organization of documents is a critical and considerable component of the ICS system. The ICS must have an organized office, which is separate from the other functions of the business.

Example:

"Documents" refers to all documentation relevant to the operation of the ICS for EU/NOP Organic rules and regulations/norms compliance. The objective is to ensure that accurate and timely records of all activities are well kept for future references and external auditing purposes.

- *All documents shall be identified with an issued number, issue date (or review date), appropriately paged, and authorized by the ICS Manager.*
- *All documents shall be reviewed periodically at internal audit, and any amendments shall be discussed and approved by the sanctioning and approval Team.*
- *Copies of the ICS Manual shall be stored where it is easily accessible for all the staff involved in the ICS*
- *Following the issue of revised documents, obsolete versions shall be withdrawn*
- *Common record-keeping forms such as farmers receipts shall be used by the group. Farm records shall be kept and be made available at all times, whether stored electronically or in a hand-written form. Records shall be legible and accessible for inspection at any time they are requested for.*

5.2 Document List

This section describes the organization of the documents of the ICS, where documents are housed, and who is responsible for using and maintaining specific documents.

Example:

Table 6 Document List

Document	Description	Control Level	Used By	Housed	Reference
ICS Manual	*Group document of all policies, procedures, and forms leading towards certification*	***ICS Management***	*All ICS Staff*	*ICS Office*	*This Document is the ICS Manual*
Organization Chart	*Shows the roles of the company and ICS and the reporting hierarchy*	***ICS Management***	*All ICS Staff*	*ICS Manual*	*Section 2.1*
Staff Qualification and Responsibilities	*Shows the staff qualifications for the ICS and their responsibilities within the ICS*	***ICS Management***	*All ICS Staff*	*ICS Manual*	*Section 2.2*
Overview Map	*ICS do a sketch map of all communities which are part of a project. Map should indicate facilities such as warehouses, roads linking communities, major water bodies, reserved forest zones, etc*	***ICS Management***	*ICS Manager, Documentation Officer*	*ICS Office*	*[Relevant Section or Appendix]*
Risk Assessment	*Use risk assessment form to conduct assessment of all potential risk that will hinder certification*	***ICS Management***	*ICS Manager*	*ICS Office*	*[Relevant Section or Appendix]*
Complains/Violation Report	*Use Complaint/Violation form at all levels to report issues in relation to the whole certification/cocoa business to the ICS. This form can be used by members of the Group/any component within the ICS, and will be available at all offices*	***ICS Management***	*All ICS Staff*	*ICS Office, Cooperative Office*	*[Relevant Section or Appendix]*

Staff List	*Group document list of all staff, vehicles, agents, VCs*	***ICS Management***	*ICS Manager, Documentation Officer*	*ICS Office*	*Included in Supply Chain Register File*
Conflict of interest	*Conflict of interest form is signed by all ICS member (Management level), Approval and Sanctions Committee and Internal Inspectors*	***ICS Management***	*All ICS Staff*	*ICS Office*	*[Relevant Section or Appendix]*
Training Attendance Form	*Use training attendance form to report any training conducted at each level of the certification process – including ICS training, organic standard training, GAP training, and traceability training.*	***ICS Management***	*All ICS Staff that administer training*	*ICS Office, Cooperative Office*	*[Relevant Section or Appendix]*
List of approved/prohibited substances	*Group document list of approved/prohibited substances not for organic use*	***ICS Management***	*Cooperative Management, Field Officers, VCs, Farmers*	*ICS Office, Cooperative Office, and VCs*	*[Relevant Section or Appendix]*
Farmer Registration Form and Contract	*Each farmer registered for the certification process should sign*	***Farmers***	*Documentation Officer, Farmers*	*ICS Office and Farmer (2 copies)*	*[Relevant Section or Appendix]*
Farmer Register and Farmer list	*Use the farmer registration form to collect all farmers' information. Aggregate all this information in the farmer register which is the group document list of all ICS member farmers, includes list of sanctioned farmers*	***Farmers***	*ICS Manager, Documentation officer*	*ICS Office*	*[Relevant Section or Appendix]*
Internal Inspection Checklist Report	*Use internal inspections checklist to conduct assessment of each group member against certification standards*	***Internal Inspection***	*Internal Inspectors*	*ICS Office*	*[Relevant Section or Appendix]*
Contract with Internal Inspectors	*Contract between Organization and Inspectors is used and signed by all Inspectors*	***Internal Inspection***	*ICS Manager and Internal Inspectors*	*ICS Office and Internal Inspector (2 copies)*	*[Relevant Section or Appendix]*
Approval & Sanctions Committee Meeting Report	*Minutes of meeting by the committee should be documented anytime they meet. Minutes should have information such as agenda, date, hours for meeting, number of farmers and communities approved, members present etc*	***Approvals and Sanctions***	*Approval and Sanctions Committee*	*ICS Office*	*[Relevant Section or Appendix]*
Sanctioning Report	*Use sanctioning report form to communicate sanctions to any member of the group/ICS. Two copies are filled*	***Approval and Sanctions***	*Approval and Sanctions Committee ICS Management*	*ICS Office*	*[Relevant Section or Appendix]*
List of Sanctions	*List of possible sanctions*	***Approval and Sanctions***	*Approval and Sanctions Committee ICS Management*	*ICS Office*	*[Relevant Section or Appendix]*
Farmer Receipt Book	*Completed when farmers provide cocoa to agents or to warehouses*	***Traceability***	*Agent*	*Copies of receipt remain with: Agent, Farmer, Warehouse*	*Section 6*
Agent Receipt Book	*Completed when agents aggregate cocoa from farmers and transport cocoa to warehouses*	***Traceability***	*Agent*	*Copies of receipt remain with: Agent, VC, Warehouse*	*Section 6*
Warehouse Ledger	*Compiles information from farmer receipts, agent receipts, and storage and transportation information*	***Traceability***	*Warehouse Managers*	*Warehouse*	*Section 6*

Cocoa Waybill	*A receipt for cocoa transporters*	***Traceability***	*Warehouse Managers*	*Warehouse*	*Section 6*
Cocoa Transport Log	*Documents all transportation of cocoa between warehouses or to export*	***Traceability***	*Warehouse Managers*	*Warehouse*	*Section 6*
Tags and Labels	*Cocoa bags are tagged with traceability information*	***Traceability***	*Warehouse Manager*	*Warehouses*	*Section 6*
Traceability Database	*Master database of all traceability for all cocoa transactions for the organic supply chain*	***Traceability***	*Documentation Officer*	*ICS Office*	*Section 6; Supply Chain Register File*
Coding	*All farmers, VCs, Agents, and warehouses are assigned a code*	***Traceability***	*Documentation Officer*	*ICS Office*	*Section 6*
Signage	*All warehouses storing both conventional and organic certified cocoa should show clear signs of demarcation for both type of cocoa*	***Warehouse***	*Warehouse Manager*	*Warehouses*	*N/A*

5.3 Soft Copy ICS Files Directory

The ICS will also have many files on soft copy. These are to be organized in a digital filing system. The file system must have a directory for the files similar to a table of contents for a document.

Example:

2021 ICS MANUAL FILES

DIRECTORY

1. ***ICS Documents***
    1. *Database Template*
        i. *ICS Database and Supply Chain Register*
    2. *ICS Forms and Templates*
        i. *Approval and Sanctions Committee Meeting Minutes*
        ii. *Complaint & Violation Form*
        iii. *Contract with Internal Inspectors*
        iv. *Declaration of Conflict of Interest Form*
        v. *Internal Inspection Report Checklist*
        vi. *Producer Contract Form*
        vii. *Farmer Registration Form*
        viii. *Sanctioning Report Form*
        ix. *Training Attendance Form*
        x. *Farmer Passbook Template*
    3. *List of Approved and Prohibited Substances*
        i. *List of Approved and Prohibited Substances*
    4. *Organic Standards Updates*
        i. *ICS certified groups and the New EU - 2021*
2. ***ICS Trainings***
    1. *ICS Level*
        i. *Conducting Risk Assessment*
        ii. *Constituting the ICS Team*
        iii. *Facilitation Skills*
        iv. *Introduction to Certification*
        v. *Introduction to ICS*
        vi. *Objectives of the ICS and Continuous Improvement*
        vii. *Organic Farming*

viii. *Record Keeping*
ix. *Steps to Certification*
x. *Waste Management*

2. *Internal Inspection*
   i. *Internal Inspection Report Checklist*
   ii. *Internal Inspection Training Notes*
3. *Farmer Training*
   i. *GROW Premium Organic GAP Field Manual – Farm Maintenance*
   ii. *GROW Premium Organic GAP Field Manual – Harvest and Post-Harvest*

3. Traceability

1. *Traceability Training*
   i. *Traceability Training Presentation*
   ii. *Traceability – Guidebook*
   iii. *Traceability – Handout*
   iv. *Traceability – Agents Reference Sheet*
   v. *Traceability - Warehouse Posters*
2. *Digital Database Templates*
   i. *Traceability Database and Supply Chain Register*
3. *Traceability Record Templates*
   i. *Farmer Receipt Template*
   ii. *Agent Receipt Template*
   iii. *Warehouse Cocoa Record Template*
   iv. *Cocoa Waybill Receipt Template*
   v. *Cocoa Transport Log Template*

6. Traceability

6.1 The Traceability System

Traceability is a key component of the organic and ICS system. All cocoa flowing through the organic system must be able to be documented to the farmer level. This can be done in a variety of ways, from using technology such as tablets, to using paper-based receipts. What is critical is that there must be a system for documenting and monitoring traceability, and that system must be described and referenced here.

This guidebook references the traceability system that was constructed by GROW Liberia and is in full compliance with organic standards. This traceability system uses a combination of paper receipts and digital databases. The system is described in a Guidebook which is part of the accompanying files to this manual.

Example:

All cocoa in the organic certified supply chain will be fully traceable at every step of movement and transaction from the farm gate to export. This is accomplished using a receipt-based traceability system with a digital database. The creation and maintenance of the traceability system is according to the "Traceability Guidebook" and associated receipt templates. A copy of the guidebook can be found at the ICS office.

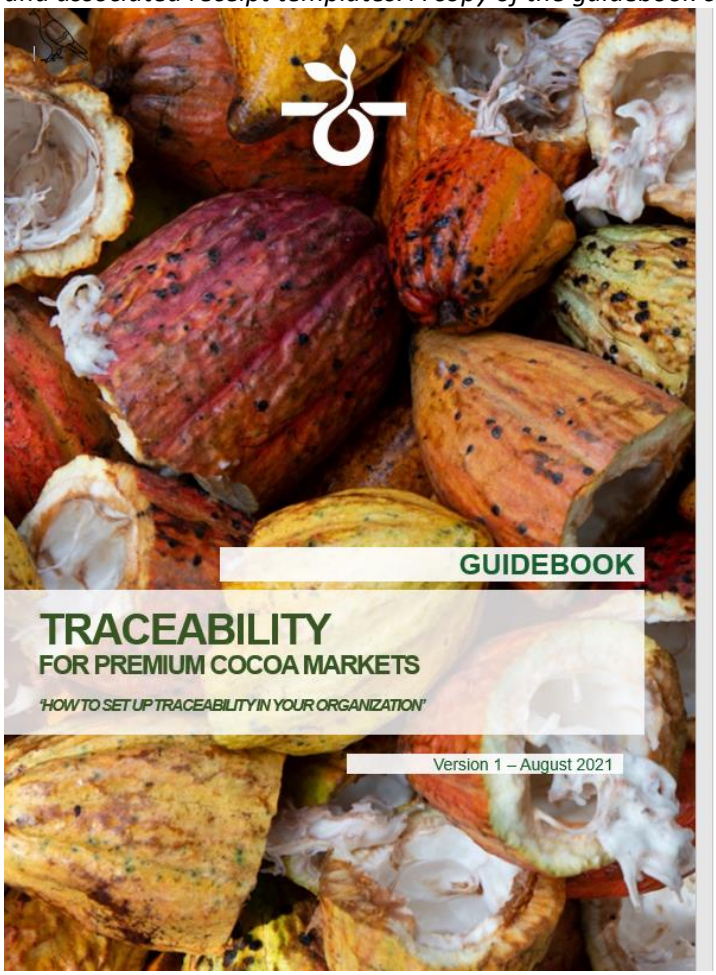


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Figure 1 Screenshot of the GROW Traceability Guidebook cover page and table of contents

6.1.1 Traceability Diagram

6.1.2 Receipts and Records

System of receipts using paper and digital records:

Table 7 List Of Traceability Receipts and Records

Step	Record	Description	Type	Medium
Step 1	***Farmer Receipt***	*Transactions between VCs and farmers*	*Receipt*	*Paper*
Step 2	***Agent Receipt***	*Transactions between Agents and VCs/farmers*	*Receipt*	*Paper*
Step 3; Step 5	***Warehouse Cocoa Record***	*Record book kept at the warehouses detailing all cocoa transactions*	*Database*	*Paper*
Step 4; Step 6	***Cocoa Waybill***	*Transactions between the warehouse, transport company, and next receiver*	*Receipt*	*Paper*
Step 4; Step 6	***Cocoa Transport Log***	*Record book kept at the warehouse recording all transport of cocoa*	*Record sheet*	*Paper*
Steps 1-6	***Traceability Database***	*Master database of all traceability transactions throughout entire supply chain*	*Database*	*Digital*
N/A	***Supply Chain Register***	*Master list of all farmers, agents, communities, warehouses, transport, etc.*	*Database*	*Digital*

6.2 Coding

All farmers must be assigned a unique code. This code should denote which community, farmer group, and geographic location that they are from. Vehicles, warehouses, and staff should also be assigned a code. An example of coding is found in the traceability guidebook. The coding system must be described or referenced here.

Example:

In order to have a transparent and unique identification of all actors in the system they are assigned a unique code. The Codes shall be used on all documents as well as on labels as appropriate. A master list of codes is found in the Supply Chain Register housed at the ICS Office. Coding is according to the protocols laid out in the Traceability Guidebook

6.3 Accompanying Material

All material for the Traceability system, and where it can be found must be described in this section.

Example:

Accompanying material such as templates, trainings, and reference material for traceability can be found housed at the ICS office. Descriptions of traceability forms can be seen in Table 4 in Section 5.2.

Table 8 Accompanying Traceability Material

Trainings	
• *Traceability Training Presentation*	*MS Power Point; PDF*
• *Traceability Training Workbook*	*MS Word; PDF*
Templates of Paper Records	
• *Farmer Receipt Book*	*MS Word; PDF*
• *Agent Receipt Book*	*MS Word; PDF*
• *Warehouse Cocoa Record*	*MS Word; PDF*
• *Cocoa Waybill*	*MS Word; PDF*
• *Cocoa Transport Log*	*MS Word; PDF*
Templates of Digital Records	

• *Traceability Database*	*MS Excel*
• *Supply Chain Register*	*MS Excel*
Posters and Reference Material	
• *Agent Reference Sheet*	*MS Word; PDF*
• *Warehouse Posters*	*MS Word; PDF*

7. Buying, Storage, and Handling Procedures

7.1 Buying, Storage, and Handling Outline

In this section the company's buying, storage, and produce handling must be described in detail. This must include:

- Cocoa harvest
- Pod breaking
- Sorting
- Transport to aggregation location
- Fermentation
- Drying
- Storage
- Transport
- Stuffing containers
- Export

Below is an example which demonstrates the level of detail required, though this is different for every company and must be adapted for all specific scenarios.

Example:
The Field Officers of [Company Name] embark on regular monitoring visits to the farming communities. When [Company Name] is in need of produce, the total quantity required is told to the supplying [Farmer Group] so they can inform their farmers to have produce available on their farm.

Mature cocoa pods are harvested by the Farmers. The harvested pods are broken and fermented in heaps on farm, and initial drying is also done on the farms.

Dried cocoa is aggregated with the assistance of village coordinators. It is collected by Field Agents or Cooperative staff, who purchase the cocoa on behalf of [Company Name] using documentation described in section 6, and transported by motorcycle to the cooperative warehouse, where it is received by the Warehouse Manager. The cocoa is aggregated in bags which are labelled with the agent code and agent receipt for traceability in accordance with the traceability system summarized in Section 6. Storage areas are cleaned and clearly labelled for the cocoa quality that they contain. If a warehouse handles different cocoa qualities, storage areas are clearly separated, at least by using different gradings. If necessary, the cocoa is dried, sorted, and bulked but only within the same lot number. Cocoa is stored in clean bags on raised pallets in the well-ventilated, clean, and dry cocoa storage spaces of the warehouse.

If cocoa needs more drying it is dried in the central solar dryers at the cooperative warehouse locations.
Once sufficient cocoa is aggregated at the cooperative warehouse, trucks are sent from the [Company Name] office. The cocoa is transported by trucks to the central warehouse in Monrovia. The contracted truck driver signs a waybill indicating the bag codes and the number of bags of each type. Bags are sewed provisionally before each transport; it is verified that the transport trucks' buckets are clean. Additionally, a tarpaulin is used to protect the cocoa from all contamination during transport. Cocoa bags of different Buying Agents can be transported together but must be stacked by organic status. Cocoa is loaded, secured, and transported to the [Company Name] head office.

The company's warehouse manager receives the cocoa, and stores in the warehouse in clean bags on raised pallets. If the cocoa is not sufficiently dried to 7.5% moisture or below, the cocoa is places in the warehouse solar dryers. The cocoa is stored in the clean, well-ventilated warehouse until export.

Export of all products is handled by [Company Name]. It has access to dedicated storage facilities in Monrovia. And if dedicated, these storage facilities will be managed by [Company Name].

Containers are dressed with cardboard and desiccators, and cocoa (bagged in clean, labelled jute bags) is stuffed into the containers. Containers are sealed and not opened until they reach final destination where they are opened by the final buyer.

7.2 Quality Assurance

This section describes how the company assures the quality and the organic status of the produce. The risk assessment should indicate areas where there might be a risk of decrease quality or contamination, for instance Often there will be a risk of produce being contaminated or comingled with conventional cocoa. The procedures for separating organic and conventional cocoa must be described in this section. There must also be described procedures for recall of cocoa beans that have been comingled or contaminated. Mitigating measures that are taken into account must be described.

Cleaning protocols and cleaning record keeping must also be described, at all stages of the supply chain. This is critical in quality assurance.

The following example can be used as a guide.

Example:

7.2.1 Ensuring Organic Cocoa Supply

[Company Name] only purchases organic cocoa from their registered farmers. This cocoa can be traced to individual farmers through the traceability system described in Section 6.

7.2.2 Separating Organic and Conventional Cocoa

[Company name] acknowledges that co-mingling of conventional produce is a serious risk to the organic integrity. LCC does not purchase or produce cocoa that is not going through the organic certification program, but if a case arises where it does it separates clearly the different streams of cocoa in the following ways:

- *Keeps material flows for different status completely separate (separate handling, storage and transport)*
- *Labels each cocoa bag according to origin and status*
- *[Company Name] shall conduct yield estimates of all organic registered producers within the group in order to have a fair understanding of the quantity of certified cocoa for a particular season or year coming from the group*
- *The group shall place a clear and unique visual identification on each and every bag containing certified cocoa*
- *There shall be a separate storage places for certified and uncertified beans both at the group and company level*
- *Each aggregation point on the project shall be given a drop mark to be placed on cocoa bags at the commercial farm or cooperative level. This coding is described in section 6*
- *At the warehouse level, the traceability officer shall ensure that certify beans are strictly not mix with uncertified beans.*
- *In Monrovia, certified beans shall be taken over into a designated traceable warehouse awaiting shipment.*
- *During shipment, certified cocoa shall be loaded into separate containers to prevent mixing of certified cocoa with uncertified cocoa.*

[Company Name] maintains a Traceability database on which produce deliveries from each Buying Agents are recorded. This database allows, among other things, to calculate the total produce delivered by each Buying Agent. A two-step control system is put in place to ensure that quantities correspond to yield estimates and to detect possible co-mingling of conventional produce:

1. *Farmer exceeding expected yields: Yield estimates of individual farmer is controlled by Buying Agents during the purchasing procedure using its ledger book. Over-delivery is reported to an Internal Inspector and Village coordinator and the produce is kept apart until the Internal Inspector has checked with the respective farmer and the ICS Manager has indicated whether to allow the farmer's cocoa into the organic supply chain.*
2. *Buying Agent buying conventional Cocoa: The individual record book content is compared at the end of each month to actual delivery as recorded by the Warehouse and ICS Managers. The sum of produce delivered from each Buying Agent is compared to the Buying Agent record on the Traceability database. If the Buying Agent is found to have co-mingled produce from non- registered farmers, actions will be taken.*
3. *Buying Agent recording wrongly: Towards the end of the main season each year, the field inspectors or Buying Agents collect / inspect all farmer records and calculate the total amount or produce delivered. This figure is compared to the total amount recorded in the purchasing/traceability database. Significant differences (20% of yield estimate) are reported to the ICS Manager who takes appropriate action.*
4. *Produce receipts: At regular intervals but at least once per year, the purchasing receipts are screened to detect if any is missing a farmer's code. Produce receipts without a farmer code and signature could indicate purchase from non- registered farmers. The traceability officer clarifies the situation with the Buying Agent.*

7.2.3 Recall Procedures

If cocoa is detected to be non-compliant with the organic standard or to have been contaminated during transport, storage, or handling, that cocoa must be recalled.

- *Recalled cocoa must be immediately separated from the organic cocoa stream*
- *Recalled cocoa must be stored in a separate warehouse space from organic cocoa*
- *ICS management inspects recalled cocoa*
- *ICS management notes in all traceability, tags and documentation that this cocoa has been recalled from the organic production, all note or organic must be amended and instead noted that this produce is recalled.*
- *All organic designations are to be removed from this cocoa*
- *This cocoa cannot be traded or sold as organic – this must be clearly and transparently communicated to any buyer of this recalled cocoa*
- *ICS management will identify when this cocoa was caused to be recalled and corrective action will be in place within seven (7) working days*
- *An incident report will be created by the ICS manager for company management*

7.3 Cleaning and Disinfestation

Warehouse cleaning and disinfestations procedures

7.3.1 Principles of Cleaning and Disinfestation

- *The storage rooms and transport vehicles and containers dedicated for organic produces storage and handling only. No other commercial activity or other storage / handling of items that are allowed there.*
- *The storage facilities, transport vehicles, and containers are to be kept clean and free from any contaminant and pest.*
- *No prohibited cleaning products are permitted in cleaning the stores, transport vehicles, and containers*
- *No prohibited cleaners are used in cleaning storage, transport vehicles, and containers*
- *A record of cleaning facilities, vehicles, and containers must be kept by warehouse staff, cocoa transporters, and ICS personnel*

7.3.2 Cleaning Warehouses and Stores

- *Warehouses sheds and any other area cocoa is stored are to be cleaned regularly, generally at the close of the working day.*
- *Cleaning is done by mechanical means unless otherwise indicated. Brushing, sweeping and manual removal of all dirt and unwanted items. If necessary, water and permitted soap may be used to clean walls, floor or tools. In that case, the produce has to be removed from the facility beforehand.*

- *Regular inspection of the facilities by ICS personnel will check for cleanliness and respect of these regulations.*

7.3.3 Cleaning Transport Vehicles

- *Vehicles are to be cleaned regularly, generally at the close of the working day.*
- *Cleaning is done by mechanical means unless otherwise indicated. Brushing, sweeping and manual removal of all dirt and unwanted items. If necessary, water and permitted soap may be used to clean walls and floors of the vehicle bed, the produce has to be removed from the facility beforehand.*
- *Vehicles will always be clean of chemicals, diesel/gasoline, and livestock*
- *Passengers are not permitted in vehicles transporting cocoa*
- *Regular inspection of vehicles by ICS personnel will check for cleanliness and respect of these regulations.*

7.3.4 Cleaning Shipping Containers

- *Shipping containers should be inspected for cleanliness and good sealed working condition before agreeing to use them*
- *Shipping containers must be inspected for chemicals prior to use, if they have been used to transport chemicals they cannot be used*
- *Shipping containers must be thoroughly cleaned before dressing and loading with cocoa. This is done by mechanical means, brushing, sweeping and manual removal of all dirt and other unwanted items. Water and permitted soap may be used, in this case the container must be thoroughly dried afterwards*
- *Inspection of the containers by ICS personnel will check for cleanliness and respect of these regulations prior to loading cocoa.*

7.3.5 Disinfestations

- *Disinfestations will be done whenever indicated (presence of pests) or instructed. Except upon strong indications chemical disinfestations is avoided.*
- *Natural disinfestations: all produce has to be removed permanently from the facility prior to any treatment. The treatment comprises burning of fresh neem leaves & seeds inside the facility using a common stove. The stove is lit with charcoal, leaves and seeds placed on top. Doors and windows and closed during this natural fumigation. All measures necessary to prevent fire outbreak are taken. After 1 hour, the facility is aerated and the stove and all remnants of the fire removed. The aeration continues until the smoke cannot be smelled.*
- *Following the treatment, the facility is not used for 3 days during which period the facility is aerated. Such treatments must clearly recorded (date, time, place, disinfectant, structure/person applying the product, reason and result). The date of resumption of activities must be determined and communicated clearly to the person in charge of the facility. The resumption of activities is to be recorded.*

7.4 Internal Inspection of Storage and Handling Facilities

There must also be internal inspection of the company's storage and handling facilities, such as warehouses, dryers, trucks, containers, etc. The protocols and record keeping for these inspections, as well as their frequency, is described in this section.

<u>Example:</u>
The internal inspection of storage and handling facilities checks on the respect of the present, relevant content of the ICS manual, covering the four principles of identification, separation, non-contamination and documentation, plus specific requirements pertaining to certified produce, plus good management practices.

At least once a year, each storage and handling facility is inspected by a qualified person, normally an Internal Inspector. The internal inspection concludes with a chapter on recommended actions to be taken, and a recommended status of the facility. The result of the inspection is communicated to the ICS manager who informs the Management to discuss necessary measures. He/she may also request a re-inspection of the facility.

[Company Logo and Name]

ICS MANUAL APPENDICES

This section is a compilation of the appendices for the ICS manual in the form of a collection of key forms and templates used in the ICS. You will note that other key forms, trainings, and databases are also mentioned throughout the ICS manual. These are files that need to be held in the ICS office in soft copy on the company computers, as described in Section 5.3. Suggested appendices in this document are:

Appendix 1: Risk Assessment

Appendix 2: Complaint and Violation Form

Appendix 3: Conflict of Interest Form

Appendix 4: Training Attendance Form

Appendix 5: List of Approved/Prohibited Substances

Appendix 6: Farmer Registration Form and Contract

Appendix 7: Sample Farmer Register and Farmer List

Appendix 8: Internal Inspection Report Checklist

Appendix 9: Contract with Internal Inspectors

Appendix 10: Approval & Sanctions Committee Meeting Report

Appendix 11: Sanctioning Report

Appendix 12: Document Amendment Form

Appendix 13: Yield Estimate Calculation

You will find in the following pages examples of these appendices. These examples will have to be modified the company's specific use.

Appendix 1: Example Risk Assessment

EXAMPLE RISK ASSESSMENT							
AREA OF RISK TOWARDS CERTIFICATION	**IDENTIFICATION OF HAZARD: What can go wrong?**	**NEGATIVE EFFECTS THAT WE WANT TO AVOID**	**SEVERITY OF NEGATIVE IMPACT: Low Medium, High**	**LIKELIHOOD OF OCCURRENCE: Low, Medium, High**	**LEVEL OF RISK: Low, Medium, High**	**PREVENTIVE ACTION(S) INCLUDING WHO IS RESPONSIBLE FOR MANAGING RISK AND WHEN**	**PERSON RESPONSIBLE**
ICS Level	Insufficient training for the ICS Team	Lack of technical knowledge to manage the ICS	High	Medium	High	Sufficient training should be conducted for the ICS Team. Refresher cause	Company Management
	Farmers do not want to sign contracts with the ICS to have their free will	IMS internal standards compliance would not be achieved	High	low	Low	Farmers must be entreated to sign the contract as the main requirement for participation	ICS Manager/ VCs
	Irregularities in farmers register	Difficulty in products and farmers traceability	High	Medium	Medium	Regular update of farmer register, especially production trend	ICS Manager
	No credible method of yield estimation is available to the IMS	There could be AN attempt of mixing certified and non-certified beans	High	Low	High	Make credible estimates using previous yield estimates	ICS Manager
	Ineffective internal inspections for group members	Farmers who do not comply with the standard may be presented for audit	High	Low	Low	Frequent training and monitoring of internal inspectors.	Field officer Extension officer
	Delay in pre-audit	IMS will be ill prepared for external audits	High	Low	Low	Organize pre-audit on time(month before main audit	ICS manager
	Approval and sanction system ineffective	Sanctioned farmers cannot exercise their right to appeal	High	Medium	Low	Organize trainings for and monitor approval and sanctions committee	ICS Manager
	Document's control	Non-compliance during audit	High	high	High	Documents review on monthly to ensure all documents are intact at the ICS level.	ICS Manager
Production	Planting stock/seedlings from non-organic source	Compromise certification	High	High	High	Farmers are trained and encouraged to obtain seedlings from organic source	VCs
	Use of prohibited organic substances for clearing and land preparation for new establishment	Destruction of living organism and compromises organic certification	High	Medium	High	Continuous training is be organised for farmers on the principles of organic farmers and effects of synthetic chemical application	ICS Manager/VCs
	Encroaching in forest reserves for farm extension	Destruction of reserves and breaking of laws	High	High	Medium	Farmer are trained on intensification and rehabilitation of their old plots	ICS Manager/VCs
	The use of burning for land preparation	Destruction of living organism affecting soil fertility	High	Medium	Low	Farmer will be trained on the effect of burning on the soil and living organisms	VCs

	The use of synthetic/prohibited substances for production	Contamination of beans and destruction of the biodiversity	High	High	High	Farmers will be trained on the effects of the use of prohibited substances. List of prohibited substances is made available to the various communities	ICS Manager/ VCs
	Sharing boundaries with a conventional farm	Prohibited substances drifting from neighbour's farm will contaminate organic plot	Medium	High	High	Farmers are trained on leaving buffer zones of at least 10 meters between organic and conventional plots	ICS Manager/ VCs
	Pollution of water bodies and the environment	Contamination and destruction of water bodies and the environment	High	High	High	Farmers will be trained on leaving buffer zones between plots and water bodies to avoid pollution	VCs.
Disease and pest Management	Use of prohibited substances	Crop contamination and destruction of natural enemies	High	High	High	Farmers are trained on natural means of controlling pest and diseases	ICS Manager/ VCs
Workers right and labour issue	Use of children for hazardous work	Against certification principles and a critical non compliance	High	High	High	Staff and producers are trained on labour rights and hazardous work not to be undertaken by children	ICS Manager/VCs
Use of forced or bounded labour	Forcefully use of labour through trafficking, bounded, coercion	Against labour laws/certification principles and compromises certification	High	High	High	Staff and farmers are trained on the consequences of trafficking and	ICS Manager/VCs
Soil fertility management	Use of synthetic fertilizers	Crop contamination which compromises organic certification	High	High	High	Farmers are trained on prohibited fertilizers and other organic means through which they can improve their soil fertility	VCs
	Soil erosion	Soil erosion depletes the fertility of the soil	High	High	Low	Framers are trained on production principles that prevents soil erosion	ICS/ VCs
Storage/Traceability	Use of prohibited substances to fumigate warehouse	Contamination of organic cocoa	High	High	High	ICS uses organic substances or natural means to control pest and diseases at the warehouse	ICS Manager/ Traceability Officer
	Records Keeping	Compromise traceability	High	High	High	Farmer are encouraged to take receipt during sales whiles group enforces their VCs to issue receipts to farmers during sales of cocoa	VCs/PA/ICS Manager/Farmer
	Storage of conventional and certified cocoa in one warehouse	Compromise the integrity of the group	High	High	High	Training will be conducted at all levels on the group's traceability systems and visual indications used by both agents and traceability officers to differentiate certified and convention cocoa. There should be corresponding documents to back quantities within each category.	ICS Manager, Agent and Traceability Officer

Appendix 2: Complaint and Violation Form

COMPLAINT/VIOLATION REPORT FORM

To be used to report sever violations, by whoever reports the violation or noncompliance

☐ The Inspector has given the following complaint/violation

☐ The farmer has given the following complaint/violation

Please tick where applicable

Nature of Complaint **(*Please tick where applicable)***

Health and safety	☐	Discrimination/Child Labour	☐		
Production	☐	Internal inspections	☐		
Conflict of interest	☐	Environment (waste,	☐	pollution)	
Application of synthetic	☐	inputs Produce	☐	sale/Traceability	
Training Attendance	☐		☐		
Labour	☐				
Produce Mixing					

Others *(**Please specify***) ……

Complaint

……
……
……
……
……
……
……
……

Name of Farmer:…… Date& Sign……..

Name of Inspector:…… Date & Sign……

Office Use only Signature from Office……..

Action to be taken……

Appendix 3: Conflict of Interest Form

Declaration of Conflict of Interest

For the internal control system (ICS), the integrity and the honesty of the provided information is very important.

The ICS must avoid situations where interests of a financial, personal or social nature influence the work of the inspectors or the approval committee.

Conflicts of interest can compromise the integrity of the certification program!

Declaration:

I will avoid any conflict of interest and i will also inform the person in charge of the ICS if the case arises. I will not inspect or will not approve of any member of my family.
I declare that I have family ties (parents, brothers and sisters, children,…) in the following villages:

…….
…….
…….
…….

I will not influence the inspection or the decision of approval of the members of my family.
I commit myself to informing the person in charge of the ICS if any changes occur in my marital or social status.

I understand well what is a conflict of interest and I declare that the information above is correct.

Name of the inspector or the member of the committee of approval or ICS:

……...

Date: ……..
Place: ……

Signature: …….

Appendix 4: Training Attendance Form

TRAINING ATTENDANCE FORM

County	District:
Community/Venue	
Programme	

TRAINING INFORMATION

TRAINING TYPE:		TYPE OF TRAINEES (tick as applicable) Farmers ( ) Lead Farmers/VCs ( ) Agronomist ( ) ICS Team ( ) Other( ) Specify	
KIND OF TRAINING	GAP ( ) GSP( ) LABOUR( ) GEP ( ) OTHER(SPECIFY( )_____		BEGINNER ( ) REFRESHER ( )
TRAINING TOPIC(s)			
TRAINING PERIOD	START DATE:	END DATE:	# OF DAYS: #of Hours:

TRAINER INFORMATION

	FIRST NAME	LAST NAME	SEX M/F	ORGANIZATION
TRAINER 1				
TRAINER 2				
TRAINER 3				

NAME OF OFFICER/:

SIGNATURE:

DATE: _____/_____/_____

ATTENDANCE INFORMATION DATE:

S/N	CODE	FIRST NAME	LAST NAME	SEX (M/F)	ATTENDEE Role	PHONE NUMBER	SIGNATURE/TP

Appendix 5: List of Approved/Prohibited Substances

LIST OF ORGANIC PROHIBITED SUBTANCES	
1-Naphthol	
3-Hydroxycarbofuran	DDD o,p'
5-Hydroxythiabendazole	DDD p,p'
Acephate	DDE o,p'
Acetamiprid	DDE p,p'
Acetochlor	DDT o,p'
Aldicarb	DDT p,p'
Aldicarb sulfone	DEF (Tribufos)
Aldicarb sulfoxide	Deltamethrin (includes parent Tralomethrin)
Allethrin	Diazinon
Atrazine	Diazinon oxygen analog
Azinphos methyl	Dichlorvos (DDVP)
Azoxystrobin	Dicloran
Bendiocarb	Dicofol o,p'
BHC alpha	Dicofol p,p'
Bifenazate	Dieldrin
Bifenthrin	Difenoconazole
Bitertanol	Diflubenzuron
Boscalid	Dimethoate
Bromacil	Dimethomorph
Buprofezin Captan	Dinotefuran
Carbaryl	Diphenamid
Carbendazim (MBC)	Diphenylamine (DPA)
Carbofuran	Disulfoton
Chlorantraniprole	Disulfoton sulfone Diuron
Chlordane cis	Endosulfan I
Chlordane trans	Endosulfan II
Chlorfenapyr	Endosulfan sulfate
Chlorothalonil	Endrin
Chlorpropham	Esfenvalerate+Fenvalerate Total
Chlorpyrifos	Ethephon
Chlorpyrifos methyl	Ethion
Clofentezine	Ethoprop
Clopyralid	Ethoxyquin
Clothianidin	Etoxazole Famoxadone
Coumaphos	Fenamidone
Cyazofamid	Fenamiphos
Cycloate	Fenamiphos sulfone
Cyfluthrin	Fenamiphos sulfoxide
Cyhalothrin, Total (Cyhalothrin-L + R157836 epimer)	Fenarimol
Cypermethrin	Fenbuconazole
Cyprodinil	Fenhexamid
Cyromazine	Fenpropathrin
DCPA	Fenpyroximate
	Fenthion Fipronil Flonicamid
	Fludioxonil
	Fluoxastrobin

List of active substances approved for use in EU organic agriculture under EU Regulation (EC) No 889/2008:	
Active substance	**Uses and restrictions**
Azadirachtin extracted from *Azadirachta indica* (Neem tree)	Insecticide
Beeswax	Pruning agent
Gelatine	Insecticide
Hydrolysed proteins	Attractant, only in authorized applications in combination with other appropriate products of this list
Lecithin	Fungicide
Plant oils (e.g. mint oil, clove oil, citronella oil)	Insecticide, acaricide, fungicide and sprout inhibitor
Pyrethrins extracted from *Chrysanthemum cinerariaefolium*	Insecticide
Micro-organisms (bacteria, viruses and fungi)	
Spinosad	Insecticide; only where measures are taken to minimize the risk to key parasitoids and to minimize the risk of development of resistance
Diammonium phosphate	Attractant, only in traps
Pheromones	Attractant; sexual behaviour disrupter; only in traps and dispensers
Pyrethroids (only deltamethrin or lambdacyhalothrin)	Insecticide; only in traps with specific attractants; only against *Bactrocera oleae* and *Ceratitis capitata* Wied.
Ferric phosphate (iron (III) orthophosphate)	Molluscicide
Copper in the form of copper hydroxide, copper oxychloride, (tribasic) copper sulphate, cuprous oxide, copper octanoate	Fungicide; up to 6 kg copper per ha per year For perennial crops, Member States may, by derogation from the previous paragraph, provide that the 6 kg copper limit can be exceeded in a given year provided that the average quantity actually used over a 5-year period consisting of that year and of the four preceding years does not exceed 6 kg
Ethylene	Degreening bananas, kiwis and kakis; Degreening of citrus fruit only as part of a strategy for the prevention of fruit fly damage in citrus; Flower induction of pineapple; sprouting inhibition in potatoes and onions
Fatty acid potassium salt (soft soap)	Insecticide
Potassium aluminium (aluminium sulphate) (Kalinite)	Prevention of ripening of bananas
Lime sulphur (calcium polysulphide)	Fungicide, insecticide, acaricide
Paraffin oil	Insecticide, acaricide
Mineral oils	Insecticide, fungicide; only in fruit trees, vines, olive trees and tropical crops (e.g. bananas)
Quartz sand	Repellent
Sulphur	Fungicide, acaricide, repellent
Calcium hydroxide	Fungicide; only in fruit trees, including nurseries, to control *Nectria galligena*
Potassium bicarbonate	Fungicide
Basic substances	Only those basic substances within the meaning of Article 23(1) of Regulation (EC) No 1107/2009 of the European Parliament and of the Council (2) that are covered by the definition of “foodstuff” in Article 2 of Regulation (EC) No 178/2002 of the European Parliament and of the Council (3) and have plant or animal origin. Substances not to be used as herbicides, but only for the control of pests and diseases

Appendix 6: Farmer Registration Form and Contract

Farmer Contract Form and Farmer Registration

Contract between the organization and the producer

The organization/Cooperative:

Represented by:

The producer:

Identification code:

Address:

The signing of this contract binds the two parties to the respect of the conditions of organic certification and the two parties accept the following obligations:

1. **Obligations of the organization:**
   - To manage the Internal Control System (ICS) and to manage its adequate operation to obtain and maintain EU/NOP organic certification.
   - To carry out a continuous training program independently or in collaboration with external expertise.
   - To promote the use of Good Agricultural Practices and the environmental and social responsibility as defined in the organic certification program.
   - To manage the purchase, the quality control, handling, transport and the sale of Cocoa certified under organic certification regulations
   - To manage information of the group with confidentiality, honesty and transparency.
   - To define the Certification Body (CB) which will carry out the inspection and external audit.

2. **Obligations of the producer:**
   - To know and respect the internal standard (which is a part of this contract).
   - To carry out the criteria of organic regulations for the production and the management of his/her fields.
   - To receive continuous training and to apply any technical recommendations.
   - To give accurate information to the internal and external inspectors and to allow their access to the production unit (farm) and any documentation.
   - To accept the internal (ICS) and external (CB) sanctions and to put the corrective measures into practice.
   - To report any change or variation of conditions of production in the farm.

3. Duration of the contract:

This contract has a duration of one year. It is renewed automatically if not terminated by one of the parties. It can be broken:

- At the time of any non-compliance with the conditions of this contract by any of the two parties.
- If the producer decides to withdraw in a voluntary way from the ICS.

4. Sanctions at the time of a noncompliance of a major principle/policy:

- In the case of a new member, the producer is not approved.
- If the producer were already approved, he will be suspended and his production will not be bought as organic certified.
- The suspension can be cancelled after confirmation of the corrective measures by a new inspection.

At the time of an undeniable fraud, an intentional obstruction of the inspection or a refusal to keep to the contract, the producer is **excluded from the** organic certification **program**, either in a permanent way, or for one given period.

By the present signature, each party accepts the conditions of the contract.

Place:

Date:

_____ _____

Representative of the organization/Cooperative Cocoa producer

FARMER REGISTRATION FORM

(A) PERSONAL DETAILS

County.....

Name of Farmer..... Phone No.....

Caretaker Name (*If plot is not managed by owner*) ..... Age.....

Caretaker's Phone No..... Gender.....

Village	
Sex	Male ☐ Female ☐
Marital status	Single ☐ Married ☐ Divorced ☐ Separated ☐ Widowed ☐
Highest level of education	None ☐ Primary ☐ MSLC/JSS ☐ SSS/Voc./Tech. ☐ Tertiary ☐
Date of Birth	
Age Range	Below 25 ☐ 26-35 ☐ 36-45 ☐ 46-55 ☐ Above 55 ☐
Where is your farm located?	near river ☐ in hills ☐ low land ☐ others ☐ (specify)
Number of Dependants	1-3 ☐ 4- 7 ☐ 8 - 12 ☐
How many people work on your farm each season?	1-5 ☐ 6-10 ☐ 11 - 15 ☐ 16 and above ☐

(B) COCOA FARM HISTORY

No	Location /Village	Size (Acre)	Type of Ownership			Age of Cocoa	Type of Cocoa	Cocoa Yield for the last 3 years		
			Tenant	Sharecropper	Owner					
1										
2										
3										
4										

(C) OTHER ECONOMIC ACTIVITIES

Other farming activities apart from cocoa

- Crops: .....
- Animals: .....
- Other non-farm economic activities .....
- Have you applied pesticide/weedcide/fertilizer on your plots for the last 3 years? Yes ☐ No ☐
- Are other farmers you are sharing boundaries with applying pesticide/weedcide/fertilizer? Yes ☐ No ☐
- If yes, since when?.....

DECLARATION: I,..... declares that the information provided is correct.

Signature/ Thumbprint ..... Date.....

Endorsed By: ..... (Village Coordinator)

Signature/Thumbprint ..... Date .....

Appendix 7: Sample Farmer Register and Farmer List

This file is available in MS Excel format at the ICS Office.

	Farmer Code Details								Farmer Details								
#	Company		Producer or Cooperative		Community		Farmer		Name		Date of Birth	Gender	Phone Numbers		Official ID		
	Company Name	Company Number/Code	Producer Group Name	Producer Group Number/Code	Community Name	Community Number/Code	Farmer Code	Farmer Role (F=Farmer/VC=VC/A=Agent)	Last	First/Given	(dd/mm/yyyy)	Male or Female	1	2	ID Type	ID Number	Cocoa Plan (Ac

Farm Details										Certification										
Farm 1			Farm 2			Totals		Past Yield		Projected Yield	Inorganic Chemicals				Certified Farm Area		ICS				
ocoa Area Planted (Acres)	Cocoa Area Producing (Acres)	GPS Coordinates	Cocoa Area Planted (Acres)	Cocoa Area Producing (Acres)	GPS Coordinates	Total Area Planted	Total Area Producing	Harvest 2019	Harvest 2020	Harvest 2021	Year of last chemicals used	Type of inorganic input used	Farm next to chemical application (Y/N)	Complying with Organic Standards (Y/N)	Total certified crop area (*Acres*)	Certified Crop Yield	Year of Farmer Registration	1st year of certification	Date of latest internal inspection	Detected non-conformities	Status this year
						0	0														
						0	0														
						0	0														
						0	0														
						0	0														
						0	0														
						0	0														
						0	0														
						0	0														
						0	0														
						0	0														
						0	0														
						0	0														

Appendix 8: Internal Inspection Report Checklist

INTERNAL INSPECTION CHECKLIST FOR ASSESSING PRODUCERS FOR ORGANIC PRODUCTION/CERTIFICATION

Farmer's name	**Farmer's Code/ID**
County:	
Community/Village:	
Date of Inspection	
Name of Internal Inspector	
Coordinates	**Latitude** **Longitude**

Land and Planting Materials (Seed/Planting Material)				
S/N	**Criteria**	**Yes**	**No**	**Justification for Answer**
1	No bad substances (eg. **Chemical weedicide, insecticide, fertilizers**) have been applied on land or cocoa farm			
2	Farmer can tell if cocoa seeding that are used for planting cocoa is organic			
3	Farmers know which seedlings to use when starting/ replanting a cocoa farm			
4	Farmers are able to tell if seeds/seedlings are organic/inorganic			
Ecosystem Destruction, Burning, Soil Fertility Management				
5	Farmer knows that burning on the cocoa farm is not allowed to destroy crop residues			
6	Farmer should only cut and burn cocoa branches that have diseases			
7	Farmland has been destroyed by logging or burning for agricultural activities			
8	Weeds are controlled by old farming practice (weeding) so that nutrients and water are not destroyed, but used by the crops.			
9	Farmer know that wood such as tree branches/leaves that are not used for timber or firewood are not burned but left to spoil to help increase soil richness			
Pest Control, Fertilizer/Manure Use in Production				

10	Farmer has used chemical fertilizers on his/her cocoa farm for the last 3 years			
11	Farmer has been trained on the natural ways of controlling pests/diseases			
12	Farmer know the types of chemical fertilizers that should not be used on their cocoa farm			
13	Farmer use natural means (GAP) to stop pest and diseases from spoiling the cocoa tree			
	Soil			
14	Has farmer attended training and is using measures that can be put in place to improve the soil?			
15	Farmer is using fertilizers on the organic cocoa farm? E.g., Human faeces, chemical fertilizer, ashes from burned manure, etc.			
16	Farmer is monitoring their cocoa farm to ensure that soil erosion is not happening			
17	Farmer is protecting their cocoa farm from erosion and nutrient loss?			
18	Is farmer using only allowed methods such as hand weeding, under brushing to control weeds on the cocoa farm			
	Buffer Zones Between Organic and Conventional Fields			
19	Farmer knows how to leave a buffer zone between organic farms. This is seen on the farm. E.g., hedgerow, flower strips, spontaneous vegetation, etc			
20	Farmer knows how to protect the cocoa farm on slope so it is not affected by nearby farms that are using chemical?			

Training, Harvest/Post-harvest handling, Traceability				
21	Farmer has received training in Good Agriculture Practices (GAP), Good Environmental Practices (GEP) and other organic principles			
22	Farmer practice GAP (**Farm Maintenance**) on his/her cocoa farm			
23	Cocoa is packaged in clean bags; bags are strong and closed properly to maintain **Grade one** quality			
24	Farmer knows about traceability of cocoa from their farm?			
25	Farmer keeps records of activities **(Underbrushing, deshading, pruning, harvesting, etc.)** on his/her farm			
26	Farmer know about GAP (harvesting, fermenting and drying); and how to handle or store cocoa up to point of sale			
27	Farmer keeps records on cocoa sales and make records available during audit			

Declaration

The Producer herewith confirms that the information given in this report is correct and complete. The producer has noted the set conditions.	
Number of criteria complied with = Number of Criteria not complied with = N/A=	
Signature/Thumbprint Farmer: Date	Signature of Internal Inspector: Date

Final classification of farmer under level is based on the level of compliance from the set criteria for assessment. The criteria are 27 in total. All farmers will go through a conversion period when they have any non-compliance in relation to inorganic chemical application.

Approval or sanction decision on behalf of the Organisation performed by Sanctions and Approval Committee

Compliance Approved without conditions: Approved with conditions: Not approved
Additional remarks
Signature SAC member Date

Appendix 9: Contract with Internal Inspectors

Contract Between Cooperative and Internal Inspectors

Preamble: Internal inspectors fulfill a crucial role in the internal control system (ICS) for Organic certification. They support on the farmer compliance with Organic internal standards. The result of the work is inspected by the external certifier, which permits Organic certification. Internal inspectors are the wardens of EU Organic integrity.

For this role, internal inspectors must have the following qualification:

- • Read/Write in English, speak at least one local language
- • Be familiar with the agricultural practices of the area
- • Be honest, respectable and trustworthy

Herewith, I the undersigned pledge to do the tasks assigned to me to the best of my knowledge and conscience, and I will avoid all conflict of interest. I acknowledge that ICS manager is my supervisor and assigns the farmers, supervises and designates a supervisor, and judges the quality and quantity of my inspection.

The following conditions have been agreed:

Remittance:
Severe violation of this contract or criminal or irresponsible may lead to an immediate cessation of this contract.

A conflict-of-interest form is signed by the inspector and the ICS manager. The internal inspector must endeavor to take good care of all materials made available to him or her. Costs for loss and damage may be incurred by him/her.

As part of the internal inspection exercise, the internal inspector may also handle non-compliance issues and communicate sanctions to farmers.

The ICS will provide appropriate training and means of transport where necessary. Both parties acknowledge that the Cooperative assumes no liability for the actions of the internal inspector and does not cover costs incurred for illness, accidents, and deaths or in validity.

Date and Place Date and Place:

…… ……

The Internal Inspector The ICS manager

Appendix 10: Approval & Sanctions Committee Meeting Report

Approval and Sanctions Committee Meeting Minutes

Date		**Organization**	
Location			
Attendees			
Meeting Minutes			
Approved By:		Signature	

Appendix 11: Sanctioning Report

SANCTION REPORT FORM

To be used to report sanctions applicable to severe violations of internal standards towards organic principles for cocoa production.

Farmer name/Code.....
County..... **Community** .....**Date** .....

SANCTION CATEGORY

Please tick where applicable

Warning ☐

Suspension ☐

Cancellation ☐

Sanction Duration

☐ Five **(5)** working days

☐ Ten **(10)** working days

☐ Six **(6)** months

APPLICABLE VIOLATIONS (PLEASE TICK)

Health and Safety		Discrimination	
Conflict of interest		Child Labour	
Application of synthetic inputs		Internal Inspection	
Training Attendance		Environment (waste/pollution)	
Produce Mixing		Produce Sale	
Labour		Traceability	

Violation(s) Details

.....
.....
.....
.....
.....
.....
.....

Name of officer administering sanction.....

Position.....Place.....Date.....

Appendix 12: List of Sanctions

NO.	CAUSE	SANCTION
1	The quantity of organic certified cocoa delivered is lot higher than projected	Exclusion if there is no technical justification after verification
2	The producer has no system to prevent mixing with non-Organic cocoa	Suspension until a system is in place.
3	Farmer does not keep records of product sales/farming activities	Warning and when the case is reported again, a suspension would be issued and followed by cancellation over a period of time
4	Not allowing the internal and external inspection of producer's farm.	Suspension from programme for a year may be imposed.
5	Not taking corrective actions result from inspection.	Suspensions until they are carried out and confirmed by an internal inspector.
6	Establishing a farm in a recently deforested are a without institutional permission	Suspensions until farmer produces a permit to that effect.
7	Producer does not maintain farm properly - Not pruning - Not removing chupons Not weeding and removing diseased pods	Suspension until farm maintainance is completed.
8	The use of agricultural inputs for weeding, fertilizing, disease / pest control prohibited for organic production	Cancellation of contract and if farmer appeals, goes through a conversion period of 3 years
9	Producer found to be using forced/bonded/child labour.	Expulsion from program
10	Discrimination of workers by group member	Warning is given to group member. If member does not change, follows a suspension and cancellation of the case persist
11	Encroaching/burning of forest or natural vegetation for agricultural purposes	Warning for the first time and suspension when the action is repeated. Duration of suspension will be determined by ICS Manager
12	Pollution of the environment and water bodies by not leaving buffer zones	Warning for the first time and suspension when the action is repeated. Duration of suspension will be determined by ICS Manager depending on the severity of the pollution if it would not compromise the group's objective towards certification
13	Establishing a farm in a recently deforested are a without institutional ppermission	Suspensions until farmer produces a permit to that effect.
14	Deforestation without no justification and measures in place to replant fallen tress	Suspension/cancellation depending on the severity of the case

Appendix 13: Yield Estimate Calculation

1. Get the Baseline yields for each farmer for the last 3 years
2. Update the baseline data every year as a guide for each year
3. Strike an average of the last 3 years yields
4. Find a percentage of the average yield for the last 3 years depending on the anticipated increase in yield based on GAP (Assume 40% increase)
5. Add the actual yield of the previous year and to the anticipated increase percentage figure
6. That figure becomes the estimated yield for the year under review
7. Repeat the process for the subsequent years by this formula;
    a Year 1 + Year 2+ Year 3 divided by 3
    b Find 40% of the average
    c Add the figure after the striking the 40% off the average to the previous year's yield of the farmer
    d That is the estimated yield of the farmer
8. Make the estimate together with the farmers' list available to all communities before the commencement of the Main Crop Season to ensure conformity in member's business.
9. All excess deliveries should be reported to the ICS Manager for the necessary action.