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Guidance for Using the Group Certification Module for the Leading Harvest Farmland Management Standard: Responsibilities of Producer Groups, Group Managers, and Group Members

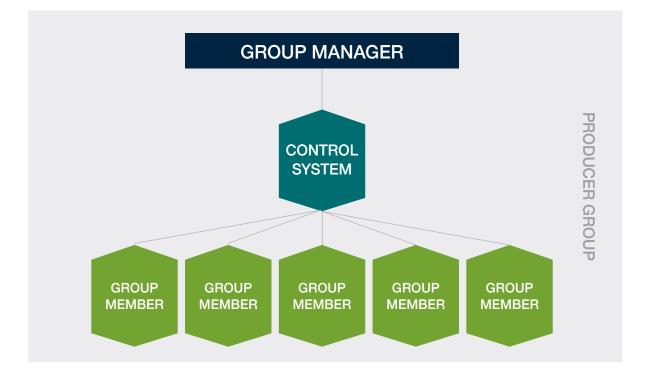
LEADING HARVEST

GUIDANCE FOR USING GROUP CERTIFICATION MODULE

RESPONSIBILITIES OF PRODUCER GROUPS, GROUP MANAGERS, AND GROUP MEMBERS

Introduction

The Leading Harvest (LH) *Group Certification Module* offers usability to a group of producers or farmers under the Leading Harvest (LH) *Farmland Management Standard*, allowing members to aggregate their farms under one control system. This document provides guidance to *Producer Groups* for enrolling its members under one control system using the LH Group *Certification Module*. A *Producer Group* could be a consortium of producers, a producer cooperative, and/or a group of producers that supply a supply chain or processor. This document outlines the responsibilities of the *Producer Group*, the *Group Manager*, and *Group Members*. It includes a description of the responsibilities of *Certification Bodies* so that all responsibilities are made clear.



Key Terms and Responsibilities

A Group Manager is an individual or team that manages certification as a group on behalf of a Producer Group. The Group Manager then enrolls Group Members in the Farmland Management Standard. This allows the Producer Group to make market claims regarding conformance to sustainable management practices while Group Members are enrolled in the Farmland Management Standard at a lower cost and administrative burden than if they enrolled individually. The Group Manager largely manages group certification by applying an Internal Control System (ICS). The ICS is a documented quality assurance and monitoring system used by the Producer Group to ensure conformance of Group Members with the LH Farmland Management Standard and overall conformance of the Producer Group with the Group Certification Module.

A *Certification Body* is the organization responsible for conducting third-party audits and may sometimes be referred to as an auditing organization or auditing team. The *Certification Body* is contracted by the *Producer Group* to conduct third-party audits of the *Group Manager* (including the *ICS*) and *Group Members* to ensure conformance with the *Group Certification Module*.

This document includes text and summaries of the responsibilities of the *Producer Group*, the *Group Manager*, the *Group Members*, and the *Certification Body*. This allows *Group Managers* to review their responsibilities and determine whether they are sufficiently managing each one.

1. Producer Group Responsibilities

The *Producer Group* is an organization that assembles a group of *Group Members* (e.g., producers and/or farmers) to pursue group certification under the *LH Farmland Management Standard* and satisfy the requirements set out in the *LH Group Certification Module*. The *Producer Group* establishes and oversees a *Group Manager*, which is typically an individual or small team of staff hired and/or appointed by the *Producer Group*. The *Producer Group* has the following responsibilities.

Program Enrollment

Enrollment: The *Producer Group* formally enrolls in the *LH Farmland Management Standard* as a *Program User* under the *LH Group Certification Module* by completing necessary enrollment paperwork and pursuing certification of its *Group Members* through the *Group Certification Module*.

Oversight

Group Manager and Internal Control System: The *Producer Group* authorizes and resources to the *Group Manager* to create and manage the *Internal Control System* so that the *Group Manager* can (1) manage the certification of the *Producer Group* and (2) ensure its conformance with the requirements of the *LH Farmland Management Standard* and *LH Group Certification Module*. It also provides resources (e.g., funding and personnel) so that the *Group Manager* can carry out its responsibilities. This includes providing general oversight to the *Group Manager*, the *Internal Control System*, and the certification process to ensure that the *Group Manager* has in place the appropriate documentation, procedures, and review systems.

Group Members: The *Producer Group* accepts written agreements from individual *Group Members* which describe each *Group Member's* commitment to implement and maintain conformance with the relevant requirements of the *LH Farmland Management Standard* and *LH Group Certification Module*.

Engagement: The *Producer Group* works with the *Certification Body* so that the *Certification Body* can assess whether the *Producer Group* meets the requirements outlined in Section 2 (*Responsibilities of the Producer Group and Group Manager, and Functions of the Internal Control System (ICS)*) of the Group Certification Module.

Review: The *Producer Group* reviews (1) the annual audit summary report that includes an assessment of conformance to the *Group Certification Module* provided by the *Certification Body*; and the *Internal Control System (ICS)* annual review and any *ICS* corrective actions to ensure that the *Group Manager* is managing the *ICS* in conformance with the *Group Certification Module*.

2. Group Manager Responsibilities

The Group Manager manages the Group Certification Module on behalf of the Producer Group. It bears most of the responsibilities for ensuring Producer Group and Group Member conformance with the Group Certification Module and the LH Farmland Management Standard. This includes supporting Certification Body activities to assess Producer Group and Internal Control System (ICS) conformance with the Group Certification Module and Group Member conformance with the LH Farmland Management Standard. The Group Manager also manages the ICS to achieve Group Member conformance with the LH Farmland Management Standard and Producer Group conformance with the Group Certification Module. The Group Manager has the following responsibilities:

General Oversight

Ensure Commitment of Producer Group to the Leading Harvest Programs: The Group Manager ensures a commitment on behalf of the whole Producer Group to establish and maintain practices and procedures in conformance with the requirements of the LH Farmland Management Standard and Group Certification Module. This requires timely communication with the Producer Group and Group Members, staffing with appropriate expertise, representing the Producer Group, establishing the ICS, and maintaining its conformance with the Group Certification Module.

Represent the *Producer Group* and manage contractor relationships with Leading Harvest: The *Group Manager* represents all of the *Group Members* of the *Producer Group* in the certification process: it ensures timely communications and contractual relationships with the *Certification Body*, timely submission of an application for certification under this module, and conformance with the annual update and reporting requirements.

Effectively Manage the *Internal Control System (ICS)*: The *Group Manager* creates and manages an *ICS* that is commensurate with the size and scale of the *Producer Group* and that provides appropriate oversight of the group's activities and verification of *Group Members'* conformance with all applicable requirements. *Producer Groups* with large acreages enrolled may need an *ICS* that is more rigorous and demanding than a *Producer Group* with small acreages enrolled to maintain a quality assurance and monitoring system appropriate for the acres enrolled.

Ensure Staff has Appropriate Background and Training: The *Group Manager* ensures that staff responsible for *ICS* activities have appropriate education, background, and/or training to successfully perform their duties in managing the *ICS* for the *Producer Group*¹. This may include training or experiences in auditing, certification, quality assurance control, continuous improvement systems (e.g., *Six Sigma, Kaizen*) farm management, and/or environmental management systems (e.g., *ISO, GLOBAL Gap*).

¹ Any training requirements for group managers/ICS personnel will initially be absent from this module.

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Managing the Internal Control System (ICS)

Managing the *ICS* is an essential responsibility of the *Group Manager*. It includes responsibilities for oversight, managing agreements and relationship with *Group Members*, supporting *Group Members*, which can include providing useful guidance, annually selecting *Group Members* for internal auditing, maintaining adequate documentation, ensuring implementation of corrective actions, reporting, and annually reviewing the *ICS* for opportunities for continuous improvement.

Oversight

Oversight of Group Certification Module: The Group Manager provides oversight of the Producer Group's conformance to all applicable requirements of the Farmland Management Standard and the Group Certification Module.

Managing the Formal Agreements between Group Members and the Producer Group: This requires that the Group Manager documents the formal relationship with all Group Members using a written agreement between the Producer Group and each Group Member. The written agreement identifies the following:

Producer Group Requirements: The Producer Group requirements for Group Member participation in group certification to LH Farmland Management Standard, which may be unique to a Producer Group;

Producer Group Rights and Responsibilities: The *Producer Group's* right and responsibility to require implementation of any corrective or preventive measures, and/or to initiate the suspension of any *Group Member* from the scope of certification, in the event of nonconformity with the requirements of the *Farmland Management Standard* or the *Group Certification Module*;

Group Member Commitment to *LH Farmland Management Standard* and the *Group Certification Module*: The *Group Member's* agreement to participate and commitment to comply with the conditions of membership in the *Producer Group*, including conformance to the requirements of the *LH Farmland Management Standard* and the *Group Certification Module*;

Allowances for *Group Member* Participation in other LH *Producer Groups*: The *Group Member's* agreement to be included under the scope of the *Producer Group's* LH certificate, and acknowledgment that participation in the *Producer Group* does not prohibit the *Group Member* from participating in another LH *Producer Group*, achieving individual certification to the *LH Farmland Management Standard*, or prevent their participation in other LH programs.

Supporting Group Members

Provide Education and Guidance: The *Group Manager* provides all *Group Members* with education, information, and guidance needed for effective implementation and maintenance of practices and procedures in accordance with the requirements of the *Group Certification Module*. This can include distribution of internal education materials (e.g., web links, webinars, newsletters, guidance documents) and workshops or distributing external agricultural extension materials and sponsoring external sustainable agriculture workshops.

Group Member Annual Audit and Monitoring Program

The Group Manager conducts an annual internal audit to assess the conformance of Group Members to the requirements of the Farmland Management Standard and Group Certification Module.

Annual Auditing: The *Group Manager* implements and maintains an annual *Group Member* audit and monitoring program, statistically sufficient to verify conformance with the requirements of the *Farmland Management Standard* and *Group Certification Module*. Typically the sampling guidance above (*Selection of Group Members for Annual Audit*) will achieve statistical sufficiency.

Selection of Group Members for Annual Audit

The Group Manager must apply the rigorous process outlined below for selecting Group Members for annual internal audits through the ICS.

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Sampling: The selection process of *Group Members* for annual *Group Member* audits must adhere to the following requirements: The sample size should generally be calculated as the square root of the total number of *Group Members*, rounded up to the next whole number. Twenty-five percent of the sample should be selected at random. The remaining seventy-five percent of the sample should be selected to include *Group Members* with: any conformance concerns or risks annually identified by the *ICS*; previous nonconformities which required corrective or preventive action; and other risk factors identified by the *ICS* relevant to the *Producer Group*. (e.g., variation in soil erosion risk and participation in environmental stewardship programs). For example, if you have 100 members, then sample size is 10 members (e.g., SQRT of 100). Three should be selected at random, the remaining seven could be selected from farms with conformance risk factors.

Altering Sampling: The size of the sample may be adapted up or down taking into account the following: results of a risk assessment; conformance history based on internal monitoring or independent audits (e.g., high level of past conformance with select or all Indicators); quality/level of confidence of internal annual monitoring; use of technologies that allow information gathering for specific requirements (e.g., remote sensing data); and based on other data sources regarding activities on the ground (e.g., USDA survey summaries, member surveys, data summaries from co-op managed pest management services).

Documentation

The Group Manager must maintain documentation of management procedures, including staff roles and responsibilities, enrollment and disenrollment procedures, the process for selecting Group Members for annual auditing, Group Member audit reports, corrective actions that must be and have been taken by Group Members, and other key records.

Procedures for Assigning Responsibilities: The *Group Manager* documents the procedures for the management of the *Producer Group* to clearly define and assign responsibilities for sustainable farm management and compliance with the certification requirements of the *Group Certification Module*. This can include organization charts and job descriptions so that members of the *Group Manager* team understand their roles and responsibilities.

Enrollment of New Members: The *Group Manager* documents procedures for enrolling new *Group Members* within the *Producer Group*, including an initial assessment of conformity with the *LH Farmland Management Standard* and *Group Certification Module*, and implementation of necessary corrective and preventive measures to ensure full conformity prior to granting membership.

Disenrollment of Non-conforming Group Members: The *Group Manager* documents procedures for dis-enrolling *Group Members* from the *Producer Group*, due to cases of unresolved nonconformity, ownership transition or other circumstances, as appropriate, including documentation and timely reporting of decertification to the *Group Member* and the *Certification Body*.

Sampling: The *Group Manager* must document within the *ICS* the selection process for annual *Group Member* audits, including the justification and reasoning for the selection of each *Group Member* and any adjustments to the sample size.

Audit and Corrective Action: The Group Manager must document within the ICS the Group Member audits, share the findings of each audit with the audited Group Member, and define what (if any) corrective and preventive measures must be taken by each audited Group Member to address any nonconformities identified.

Other Key Records: Group Managers must document and maintain the following records as a part of the ICS:

Conformity and Certification Records: The *Producer Group's* and the *Group Members'* conformity with the applicable LH certification requirements as defined by the *Group Certification Module*;

Key Information about Group Members: All current Group Members, including their contact details, locations and acreage of enrolled land, and crops produced on enrolled land;

Annual Report of Group Member Activities: An annual report of activities and practices carried out on the enrolled land owned/managed by the *Group Members* to demonstrate alignment with the applicable parts of the *Farmland Management Standard*. For example, an annual report could contain statistical summaries of all *Group Members* concerning key activities and practices relevant to conformance.

Annual Auditing Records including Corrective Measures by Group Members: The implementation of an annual Group Member auditing/monitoring program and any preventive and/or corrective measures required of the Group Members (see Selection of Group Members for Annual Audit for more detail);

Annual Audit of Producer Group and ICS: The implementation of an annual internal audit and management review of the *Producer Group* and the *ICS* and its functions, including any corrective actions taken as a result of the review (see also <u>ICS</u> <u>Reporting</u> below).

Managing Corrective Actions

Managing Corrective Actions: As a part of the *ICS*, the *Group Manager* must ensure necessary corrective and preventive measures are taken by *Group Members* in a timely manner and are sufficient to correct the nonconformities identified. If sufficient corrective actions are not taken by a *Group Member*, the *Group Manager* must take action to remove them from the *Producer Group* and the *ICS* must have provisions for doing so.

Producer Group Reporting

The Group Manager must make reports to the Certification Body when non-conformities occur and to Leading Harvest to document enrolled Group Members.

Reporting to Certification Body: The *Group Manager* reports to the *Certification Body* when the *Producer Group* removes *Group Members* with unresolved, serious, and continuing nonconformities as indicated by *Group Member* audits and/or the *ICS* monitoring program.

Reporting to Leading Harvest: As part of the annual re-enrollment process, the *Group Manager* provides a report to Leading Harvest that includes the list of current *Group Members* and associated data outlined in Documentation (e.g., their contact details, locations and acreage of enrolled land, and crops produced on enrolled land).

ICS Annual Review

The purpose of the annual review of the *ICS* by the *Group Manager* is to ensure the *ICS* is functioning in conformance with the *Group Certification Module* and is continuously being improved.

Annual Review: The *Group Manager* conducts an annual management review of the *Producer Group* as a whole as per Objective 12 (*Management Review and Continual Improvement*) of the *LH Farmland Management Standard*, with the addition of an internal audit of the functions of the *ICS* and its ability to meet the requirements of the *Group Certification Module*. The *Group Manager* has a role in helping *Group Members* achieve Objective 12 of the *LH Farmland Management Standard* by:

- Reviewing the *ICS* and its commitments, programs, procedures, and measures of progress; and evaluating its effectiveness in achieving the Objectives of the *Farmland Management Standard* (Indicator 12.1.1 Performance Review);
- Administering procedures for collecting, reviewing, and reporting information documenting progress in achieving *LH Farmland Management Standard* and sharing individual results with each *Group Member* (Indicator 12.1.2 Performance Monitoring);

The Group Manager may elect to have Group Members independently address Indicators 12.1.3 (Agricultural Innovation), 12.1.4 (Annual Review and Improvement), and 12.2.1 (Support for Agricultural Research) or address these indicators on behalf of the Group Members. If the latter, it could include:

- Managing a process for identifying opportunities and sharing information about improving farming efficiency, using improved technologies, and/or participating in new markets (Indicator 12.1.3 Agricultural Innovation);
- Reviewing *Group Member* progress and sharing information about improvements that could improve agricultural efficiency and farm conformance to the *LH Farmland Management Standard* (Indicator 12.1.4 Annual Review and Improvement)
- Supporting science-based agricultural research programs or partnerships or other efforts by associations to improve soil health, agricultural productivity, and sustainable agriculture and routinely sharing information about these programs and/ or associations with *Group Members* (Indicator 12.2.1 Support for Agricultural Research).

Corrective Action: Based on the management review findings, the *Group Manager* identifies and implements corrective and preventive measures, and identifies and acts upon opportunities for continuous improvement, for the *Producer Group* and the *ICS* functions/management.

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3. Group Member Responsibilities

The Group Member's responsibilities are fairly simple. They include submitting a written agreement describing their commitment to the LH Farmland Management Standard, making available documentation of agricultural activities, taking necessary corrective actions to maintain conformance with the LH Farmland Management Standard, and participating in internal and external audits when selected.

Work with Group Manager

Provide a Producer Group Written Agreement: Each Group Member provides a written agreement with the Producer Group that describes the Group Member's commitment to implement and maintain conformance with the relevant requirements of the LH Farmland Management Standard and Group Certification Module. The Group Manager can provide draft text of the letter, which may also address other aspects of the Producer Group – Group Member agreement found in Oversight:

- In the event of nonconformity, the *Producer Group's* ability to require implementation of any *Producer Group* requirements for *Group Member* participation in group certification;
- Corrective or preventive measures, and/or to initiate the suspension from certification; and
- The Group Member's agreement to be included under the scope of the Producer Group's LH certificate, and their ability to freely participate in other LH programs. It may include surveys of Group Member activities, which can identify conformities with LH Farmland Management Standard.

Provide Documentation: Each *Group Member* provides all requested data, documentation, and other information to the ICS, *Group Manager*, and/or *Certification Body* necessary for meeting the requirements of the *Group Certification Module* in a timely manner for formal audits, and reviews, or to address other requirements. This often is mostly information that a *Group Member* already has on hand, for example, vendor contracts and reports, USDA documentation, documents related to employees, etc.

Make Necessary Improvements: Each *Group Member* implements and provides evidence of necessary corrective and preventive actions when these actions are required by the *Group Manager* and the *ICS*. Typically the *Group Manager* works with the *Group Member* to review the requested corrective and preventive actions and work together to identify a plan to address these actions.

Participate in Certification Procedures

Participate in Audits and Internal Reviews: Each *Group Member* provides full cooperation, assistance, and access to enrolled land to the extent necessary to enable the satisfactory completion of audits, reviews, monitoring, relevant routine inquiries, or corrective actions. Most commonly, this includes routine inquiries and frequent participation in audits by the *Group Manager*. Less frequently, this includes participation in audits by the *Certification Body* and completing corrective actions.

4. Certification Body Responsibilities

The *Certification Body* works with the *Group Manager* to conduct audits of the *Group Members* and *ICS* and report audit results, including need for corrective actions.

Work with Group Manager

Producer Group Auditing: The Certification Body assesses and determines the conformance of the Producer Group as the Program User. This includes an annual review of the ICS by the Certification Body to evaluate whether the activities and functions of the ICS are sufficient to ensure individual Group Member is in conformance with the Farmland Management Standard, and that the Producer Group meets the requirements outlined in Section 2 Responsibilities of the Producer Group and Group Manager, and Functions of the Internal Control System (ICS) of the Group Certification Module. As part of the annual audit process for a Producer Group, the Certification Body conducts site visits to a representative sample of individual Group Members, in accordance with the multi-site audit requirements in the Farmland Management Standard.

Audit Reporting: The *Certification Body* provides an annual audit summary report to the *Producer Group*, as required in section 2 of the *Farmland Management Program* manual, that also includes an assessment of conformance to the *Group Certification Module*. The report will include a summary of conformities and non-conformities of the *ICS*, the *Producer Group*, the *Group Manager*, and *Group Members* and any corrective action requirements.



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