



Naturland-specific requirements for Internal Control Systems based on new group certification requirements of Regulation (EU) 2018/848

This is a summary of Naturland-specific requirements for Internal Control Systems, intended for groups already compliant with the provisions for group certification of Regulation (EU) 2018/848. The summary gives a general overview of requirements that need to be fulfilled for Naturland certification on top of the requirements of the EU organic regulation. Since the EU regulation is not yet implemented in third countries (a transition period still applies until 31 Dec 2024), the list of requirements may be adjusted during further evolution of the new rules. For more detailed information, please also refer to our Naturland ICS Manual (under revision, latest version is available [here](#)). Additionally, please observe the [Minimum Requirements for Internal Control Systems](#) as attachment to your Naturland producer contract. In case of any questions, please contact membersupport@naturland.de.

General procedures and documentation: Naturland-specific requirements for organic production and social responsibility must be included in ICS procedures and documentation, e.g.

- **Internal organic standard:** The group must define Naturland specific requirements for organic production relevant to the project (e.g. whole farm conversion, agroforestry requirements for coffee/cocoa/banana, allowed fertilizers and plant protection products, conversion of forests and natural ecosystems)
- **Internal social standard:** The group must define requirements for social responsibility that are relevant for the group; social responsibility must be included in procedures of internal control and documentation (e.g. internal checklist, approved farmer list)
- **Internal checklist:** The group must define questions to check the compliance with Naturland specific requirements for organic production and social responsibility as defined in the internal regulation.
- **Membership agreement:** The membership agreement needs to include a reference to Naturland certification.
- **Trainings** of ICS staff and members regarding Naturland specific requirements for the group.
- **List of members:** Naturland certification must be indicated in the members list or in a separate list of Naturland farmers; Members list should also indicate whether farmers have hired labour in the fields.

Whole farm conversion: The Naturland standards require whole farm conversion based on the principle of the manager's unit. In case of smallholder grower groups, this means that:

- the ICS manager must not be responsible for the purchase/marketing of conventional products and operating resources.
- The ICS manager must not have a managerial position in a conventional operation.
- Naturland must be informed about any responsibilities of the ICS manager related to conventional products.

The group should support its members to convert all cultivated fields to organic production, including crops for self-consumption or local market. In case that Naturland identifies an increased risk for contamination or commingling of organic and conventional produce, Naturland may request further specific measures (e.g. precautionary measures, conversion to organic).

Conflicts of interest of ICS staff: The ICS manager must not be involved in management or marketing of conventional products. Additionally no sanctioning of family members and close friends; Similarly, purchasing staff must not be involved in purchasing of both organic and conventional crops at the

same time; Internal inspectors must not inspect farms of family members or close friends. If ICS staff has private business relations with group members, this can also be a conflict of interest.

Recommendation: The group should have an approval committee (at least 2 people that are not part of the management) that supports with internal certification decisions.

Farm maps and Project overview maps: The group must keep an up-to-date overview map, as well as farm maps for each plot as specified in the Naturland ICS Manual.

Organization chart: The group must keep an up-to-date organization chart displaying the structure of the group. Responsibilities must be clearly defined and the responsible persons must be indicated for each position.

Product flow and traceability: The group must ensure separation of goods with different qualities and prevent contamination and commingling (e.g. organic Naturland, organic EU, in-conversion, others). Naturland reference must be indicated on the goods and on related documents such as dispatch notes, invoices, etc.

Risk assessment: The ICS must conduct a risk assessment analyzing potential risks to the organic integrity of the project during all steps of the product flow (from field to export), including also risks related to Naturland certification; Measures to minimize the identified risks need to be included in ICS procedures (internal inspections, trainings, etc.).