



9191 Towne Centre Drive, Suite 510
San Diego, CA 92122 • USA
858-792-3531 • Fax: 858-792-8665
www.qai-inc.com

Group Management Certifications

Mark Bradley, NOP Associate Deputy Administrator, announced at the recent Certifying Agent trainings (held January 23, 2007; EcoFarm Conference, California; and February 15, 2007, BioFach, Germany) that the current NOP interpretation of 205.403(a), “all production units, facility, and sites must be 100% site-inspected on an annual basis,” includes all sites within a Group Management Operation. This is contrary to current national and international certification schemes for these types of operations.

Currently, all members within a group management operation are not inspected by the NOP Accredited Certifying Agent annually. Group Management Operations have established internal control systems to ensure that all members of the group are operating according to their Organic Compliance Plan and the NOP Rule. All individual members are inspected by the internal control system on an annual basis. The internal control system, and a prescribed percentage of the individual members, are inspected by the Certifying Agent annually to verify that the entire operation, including all members of the group, are compliant. This group certification scheme is in line with the National Organic Standards Board’s (NOSB) 2002 recommendations on group management certifications as well as grower group certification guidelines developed by the European Commission and IFOAM.

Group management systems that are currently certified to the NOP include community grower groups in developing countries as well as grower and handler groups, e.g., Amish growers and retailer groups, in the USA and Canada. Group Management Operations are normally composed of a large number of individual members who operate and produce similar products, such as coffee, tea or sugar co-operatives. Inspecting 100% of members is often cost prohibitive for the certified operation.

The NOP’s recent position is expected to have a large impact on group management participants as well as handlers and consumers who purchase their products. If you are concerned by this recent clarification, please contact the Organic Trade Association (OTA), specifically, Tom Hutcheson, OTA's Regulatory & Policy Manager, at thutcheson@ota.com.