

**DEVELOPING AND IMPLEMENTING AN
INTERNAL CONTROL SYSTEM
FOR WILD PLANT COLLECTION OPERATIONS**



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1 Background and rationale

This Internal Control System (ICS) guidance manual is a tool designed for wild collection operators seeking certification according to the FairWild standard Version 2.0 as well as organic standards. Internal control systems (ICS) originated in a farm and cultivation context where they have become a core element of quality assurance at producer level and being accepted by national standards such as EC 834/2007 and NOP/USDA present a strategy for smallholders farmers to collectively (i.e. under one certificate) access the organic market.

This manual targets wild collection operators with a high number of collectors. The control of the whole collection operation is becoming increasingly difficult when the number of collectors is large and when they are located in far apart collection areas. On the one hand an ICS serves to improve the management and ability to maintain a complex collection operation, on the other hand the ICS will reduce the time needed for external certification, and thus the overall costs for certification. However, the introduction of an ICS is not required by the FairWild standard and is thus a voluntary option for wild collection operators.

2 What is an ICS?

The International Federation of Organic Agriculture Movements (IFOAM) defines an ICS as follows: *“An ICS is a documented quality assurance system that allows an external certification body to delegate the annual inspection of individual group members to an identified body/unit within the certified operator”*.

This means in practice that a wild collection operation basically controls all collectors for compliance with FairWild collection rules according to defined procedures. The certification body then mainly evaluates whether the ICS is working well and efficiently. The evaluation is done by checking the ICS documentation system and staff qualifications and re-inspecting a certain proportion of collectors.

3 Structure of ICS

An ICS consists of various elements and procedures as well as personnel who fulfil certain roles in ensuring the quality at the producer level.

Before a collector can be certified in an ICS, certain steps need to be followed before he/she can be found compliant and be approved.

3.1 Steps in the collector approval

Registration:

All collectors who shall be included in FairWild certification need to be formally registered as FairWild collectors.

The recruitment process of new collectors could involve a first training preceding the registration but there are no prescriptions regarding the order. In the course of the registration process an individual contract is signed between the company and the collector.

During registration basic information is collected regarding collection practices (e.g. harvest method, location of collection activities) and awareness of sustainability aspects, the basic data should be documented (e.g. in an internal inspection form and/or the collectors list).

It is of course possible to include household members in the registration of one collector, however, the number and age should be documented.

Internal inspections:

Each registered FairWild collector is inspected by the internal control at least once a year by qualified internal inspectors.

- The internal inspection should take place during the collection season before/at harvest and definitely before purchase. In case of a variety of different plants collected and the associated prolonged harvest time, more than one inspection visit are recommended. The inspection visit can be combined with the resource assessment if this task is also performed by the internal inspector.
- The inspection must be carried out by interviewing the registered collector (or his/her representative) and include a visit of all collection areas (preferably all sites) and storage (processing) facilities
- The visit is documented in the Internal Inspection Checklist, which is signed by the internal inspector and acknowledged (by signing) by the collector (or his/her representative). At the end of the inspection, a final discussion takes place in which the deviations and necessary corrective measures are explained. By signing the collector confirms that the information given in the checklist is correct and that he/she accepts the results and the proposed corrective measures of instructions for improvement. Sometimes non-compliances may be detected by field officers during advisory visits or similar. Obviously the same procedures (investigate-document-report-act) will be necessary in this case.
- In case of severe non-compliances, the problems have to be reported immediately to the ICS Manager and all measures taken according to the internal sanction procedures.

One crucial part of the internal inspection is the projection and verification of harvested amounts and connected sustainability/traceability:

- It is important to find out from the collector the quantities he/she intends to harvest from each of the plant species in a specific area. Likewise receiving information about the potential harvest (i.e. the overall harvestable biomass or plant parts) is crucial. This information can be included in the resource assessment.
- Furthermore internal inspections should closely look at whether prescriptions from internal collection rules are followed. This includes harvest methods used, frequency of collection in a collection area and minimization of negative impacts on the habitat.
- The internal inspector verifies the quantities that have been sold in the last year and registers the yield estimation for the present harvest.
- Yield estimates are important during buying, since the delivered quantities are continuously counterchecked with the estimates. The buying officer should keep a collectors list showing yield estimates per collector and delivered quantities. If reliable harvest estimations are available, the purchase officer has a chance to detect deviations from the internal collection rules, e.g. the collector may have mixed his/her collection amounts with bought-in plants or collected amounts which are no longer sustainable. As delivery of quantities exceeding estimates can lead to discussions, if not suspicions, good yield estimations are a key element in the internal inspection.

Approval:

The company needs to define procedures and set criteria according to which collectors are either approved or sanctioned. After internal inspections the following steps are taken:

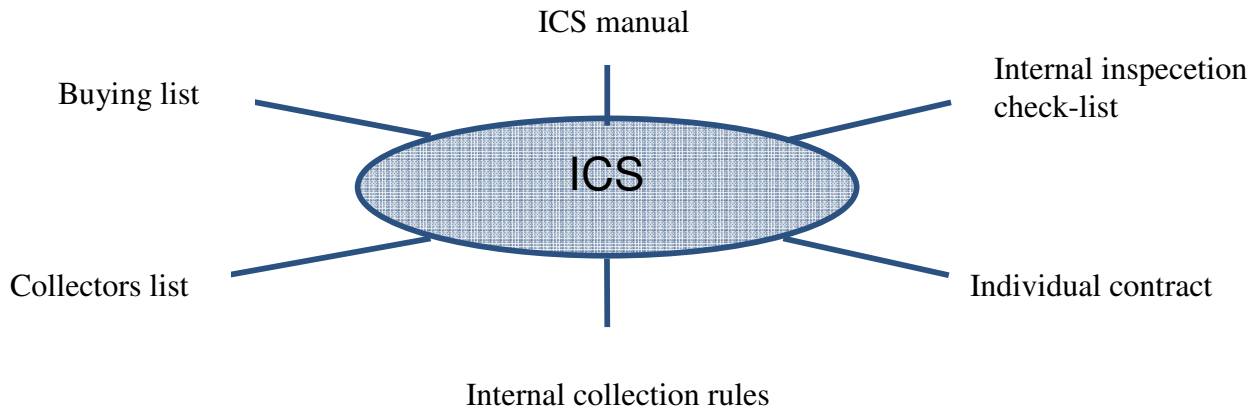
- 1.) All internal inspection checklists are screened by the approval staff with special focus on critical / difficult cases. The assessment of the internal inspector is checked and if necessary, conditions are set.
- 2.) Following the findings of the internal inspection and the decision by the approval staff, the collectors list gets corrected to show compliant collectors.

The findings during the approval processes should be documented in a short protocol, this is absolutely mandatory if collectors severely deviated from the internal collection rules. For such cases sanction mechanisms need to be defined depending on degree of non-compliance, e.g. no purchase from non-compliant collector for one year and in-depth training. It has to be made sure that purchase officers are informed and the name of the collector is removed from the buying list.

If a collector fails to comply with the FairWild collection rules and this is not detected by the internal control, he/she exposes all of his/her fellow members to the risk of de-certification of the project or at least of large product lots. If a serious non-compliance is found during or after the processing, all the FairWild production lots that contain the products of the offending collector may be de-certified. Also the ICS certification of the whole group may be threatened because the ICS has failed to detect the problem.

3.2 Documentation of ICS

The following documents should be maintained within an ICS:



1. ICS manual

Each company maintaining an ICS needs to compile an individual company manual which describes all ICS procedures and contains the internal forms, hence the name ICS manual. If a management plan (as it is required for FairWild certified operations) has already been established, the ICS procedures should be incorporated (or likewise an initial ICS manual can be amended into a management plan)

The following aspect should be compiled in the ICS manual:

Brief description of the company structure and activities

- a) an overview of the collection area and collection activities should be given including size, target species per area, climate, habitat, principal economic activities, land use as well as a description of collection practices is needed: who collects the plants, how is the product collected, collection season, what is its traditional use, what is the status of the plant, which threats do plants face and additional relevant aspects.
- b) An overview of buying, handling and export must be given, i.e. a description of all the steps that take place from harvest until the final sale of the product to another entity, including indication of whose responsibility the product is under at each step.
- c) All internal procedures and responsibilities regarding ICS need to be described. Further details on this aspect are provided in the following sections.
- d) A detailed risk assessment needs to be elaborated (see chapter 4).
- e) Adapted internal inspection check-list and other relevant documents should be added as annexes.

The final ICS manual itself can initially be a fairly simple document. It is more important that the procedures and forms are actually implemented and understood by

all staff than that the manual contains details on every eventuality right from the beginning.

All relevant parts of the ICS manual and descriptions of ICS procedures must be made available in appropriate form to the persons responsible for implementing the respective requirements or procedure.

The complete internal ICS manual must be distributed to the members of the FairWild Approval Committee and/or the FairWild Approval Manager as well as to the internal inspectors. The full internal ICS manual shall also be made available upon request to collectors and associated organizations/operators which are part of the FairWild project. It is recommended that the top management is involved as much as possible in the ICS procedures and also has to approve the ICS manual.

The ICS manual shall reflect the reality of the ICS and current requirements of the certification standard and therefore needs to be reviewed on a regular basis and updated when necessary. Changes should be communicated to all staff concerned.

2.) Internal inspection check-list

As a prerequisite for conducting internal inspections, one check-list should be filled out per collector (a sample check-list is found at the end of this guidance manual). It should be adapted to the specific company situation reflecting defined ICS procedures, the check-list may of course also be adapted to document basic data during registration.

3.) Individual contract

Each collector needs to confirm by signing a contract with the collection operator that he/she is ready to follow the FairWild collection rules and accepts certain conditions such as the requirement to be internally and externally inspected. On the other hand the operator lays down his own obligations and rights granted to the collector.

4.) Internal collection rules

The internal collection rules are a set of quality requirements which need to be compiled by the company and which have to be followed by collectors. The internal collection rules or at least a summary of rules can also be included in the contract.

5.) Collectors list

This is the summary of the internal inspections, it needs to show the name (and code) of collectors, the collection area(s) (ideally incl. size e.g. in ha), the number of household members active and the projected yield estimates per collectors per plant. Of course it can contain more information such as the date of internal inspection and the name of internal inspector. The list can be established at collector registration and be corrected after the internal inspections.

6.) Buying list

This document is kept at purchase centres by buying officers. It contains the collectors' names (and code), a list of plants to be bought, projected yield estimates and a column for collectors deliveries. According to preference the collectors list can also be made into a buying list by adding a column for deliveries.

In addition a small booklet can be handed out to each collector which can encourage collectors to maintain basic data on dates of collection, collection site, and encountered difficulties regarding particular plant species (e.g. scarcity).

3.3 Organization and ICS Personnel

For each procedure or task of the ICS, one person is responsible. Staff should be aware of their responsibilities and qualified for their job. The ICS operator has to ensure that there is sufficient qualified personnel to implement the ICS procedures as described in the internal ICS document.

In the following listing different staff positions are described, but obviously the names for each position or the exact split of responsibilities between different positions and persons may vary from operator to operator. It is important to have an organizational chart of the operator's organization which shows the organizational units, hierarchies and positions of the project company's staff.

ICS Manager/coordinator

There has to be an assigned ICS coordinator who is in charge of coordinating the Internal Control System, organizing the internal inspections, coordinating between field staff and approval staff, coordinating the external inspection, and acting as a the contact person for the inspection body.

The ICS coordinator or ICS Manager is a crucial position within the ICS. The ICS coordinator is in charge of ensuring that the ICS is implemented. He/she organizes the extension service and the internal inspection (who inspects where and when), ensures that the staff have all resources available to do the inspections/extension (e.g., means of transport etc.), makes sure that all collectors really are inspected and all new collectors registered properly. He/she organizes the staff trainings, coordinates all relevant aspects with the FairWild certification body, etc. The Approval Manager makes the decisions on the severity of deviations (like a certification officer), whereas the coordinator is rather the manager/organizer (like a general manager of the ICS). In many cases both jobs will be done by the same person, however in large operations the two positions should be managed by different persons.

Internal inspectors

There must be a sufficient number of qualified internal inspectors in order to perform thorough and objective internal inspections. For each internal inspector the Curriculum Vitae (CV) has to be available as well as a contract (including his/her

duties) and a declaration that he does not have any conflict of interest with participating collectors or other parts of the operation.

Internal inspectors have to be well trained. It is very important that the ICS operator ensures that each inspector understands well how to do effective checks, how to fill in the checklists, and how to handle cases of non-compliance. This is also important since the overall assessment of the ICS will focus very much on the effectiveness of the internal inspection. It is recommended that internal inspectors regularly (e.g., at least once a year) accompany other experienced inspectors so that they learn from each other.

Normally the following requirements will be expected in order to consider an internal inspector “sufficiently qualified”:

- The inspector can read and write
- The inspector is fluent in the local language and idiosyncrasy of the collectors
- The inspector is familiar with the ecology of the area’s species/habitat and collectors practices/realities
- The inspector is trained and familiar with principles of FairWild collection, internal control procedures, and the internal regulation
- The inspector must not have conflicts of interest that might affect his/her work

Tasks of the internal inspector include the following:

- Registration of the collectors in the collector list or a similar document
- Realizing the inspection at each collector at least once a year. The visits must be documented in the Internal Inspection Form
- Realize regular inspections at the buying stations during harvest season in order to ensure that the procedures as mentioned in the ICS are followed

FairWild Approval Personnel

There has to be a qualified person (the “FairWild Approval Manager”) or a certification committee which is assigned to take the internal approval decisions. Approval personnel must be qualified and able to take objective approval decisions. There has to be a CV, a signed declaration of conflicts of interest, and a written contract with list of responsibilities available for all approval personnel.

Approval procedures can be realized by an ICS coordinator or by a FairWild Approval Committee. It is recommended to install an approval committee but it is not a requirement.

The duties of the internal approval staff are to perform the tasks as described in the chapter about approval decisions. In case of an approval committee there is usually an approval manager as well who prepares the decisions (who screens the reports and presents only the most critical cases to the committee) plus the committee to actually approve the collectors so that they can be listed in the collectors list as “approved”. If the personnel consists of only the FairWild approval manager, he/she is usually responsible for all steps of the approval procedures.

An approval manager should fulfill at least the following requirements:

- He/she must be familiar with the principles of FairWild collection
- He/she must be familiar with the internal regulation

- He/she must be well respected among the collectors and the organization
- He/she must not have conflicts of interests

The composition of the Approval Committee has to be carefully chosen in order to have a balance of different interests and influence, but also to minimize potential conflicts of interests.

Field advisors

Training of collectors in FairWild is crucial and therefore the position of the field advisor/officer is very important. This task can be realized e.g. by lead collectors who have a good knowledge of FairWild principles. Field officers often keep some simple field documentation on behalf of the collectors. Obviously field officers must also report major deviations if they find them. If there are field advisors, they should have a written contract and clearly assigned responsibilities.

Conflicts of interest

Conflicts of interest can be defined as any situation in which an individual or operation is in a position to exploit natural or human resources, such as collected plants and the collection area or the collectors, workers and other staff members in some way for their own benefit, disregarding the actually assigned tasks. It is absolutely crucial that:

- The ICS personnel must not have any conflicts of interest that might hinder the work. The Internal Inspector is not allowed to inspect the collection of his/her immediate neighbors, friends or family.
- All possible conflicts of interests have to be declared in a written statement. It has to be ensured that alternative solutions are found for those cases where a conflict of interests would arise.

4 Risk assessment

Risks which might jeopardize the FairWild product quality at the different levels of collection, purchase, processing and storage must be known and taken into account in all internal control procedures.

- A detailed initial risk assessment must be completed once. The risk assessment has to identify risks at the different levels of collection, purchase and storage (processing) as far as the product is under responsibility of the ICS operator.
- The risk assessment has to be repeated regularly, ideally once a year and when ever there are important changes in the assortment list, collection areas, management etc.
- The ICS has to permanently take all measures to minimize the identified relevant risks.

The initial risk assessment is the very first step toward raising awareness of critical aspects to be tackled in the ICS. It is recommended to repeat the risk analysis exercise regularly to be aware which of the previously identified risks might still be

jeopardizing the FairWild quality and what are the most important risks at present, since risks can always change. Example: while in an initial risk assessment the main focus will be on collection itself and the potential risk that collectors sell conventionally collected plants (e.g. by purchasing from unregistered collectors), in the following years the risk may be more on the ICS side. There might be not enough staff to finalize 100% of the internal inspections, or there might be a quick turnover of staff so that new inspectors could be too inexperienced.

An ICS operator should always be aware of the current main critical control points in order to take appropriate preventive measures in his overall risk management.

The following table gives an example how the matrix for risk assessment might look like:

Risk criteria	Situation found	Assessment of Risk		
		High	Med.	Low
Is there a high demand for the target species which might result in over-exploitation?				
Do collectors need to cover long distances / have difficult means to reach the area of target species?				
Do collectors generally derive a high percentage of their livelihood from plant collection?				
Do collectors derive a high percentage of their livelihood from collection of the target species?				
Is the collection area near sources of contamination like human settlements, roads, factories etc?				
Do collectors use domestic insecticides against insects in their houses (anti fly/mosquito spray)?				
<i>Further points to be added</i>				
H= High risk M=Medium Risk L= Low Risk				

5 Training

The main objective of training is to inform and train collectors and project staff in the relevant aspects of FairWild and, especially, to make them aware of the contents and practical implications of the internal regulation for species and collection area conservation.

Training of ICS personnel

Each internal inspector needs to receive at least one training per year by a competent ICS member. The date of participation and content of the training should be documented in the staff files. As mentioned before it is crucial that all FairWild staff is aware at all times of the FairWild procedures. Qualification of internal inspectors is particularly important and in addition to an official training it is much recommended that each inspector accompanies a couple of inspections of another inspector each year.

Also the approval staff or purchase staff might need training to ensure they are well aware of all requirements and are able to implement them. All such trainings should be documented and may be requested during the external inspection.

Training of collectors

Among the most important aims of a FairWild project is the improvement of collector's knowledge and understanding on how he/she can play an active part in maintaining the target species and the collection area for future collection through sustainable collection practices. Each collector needs to receive at least one initial advisory visit by the extension service or in an organized training. Follow up trainings are needed when ever new plants are collected, and for plants which can not be classified as "low risk", e.g. most medicinal plants. The participation and content of all trainings needs to be documented.

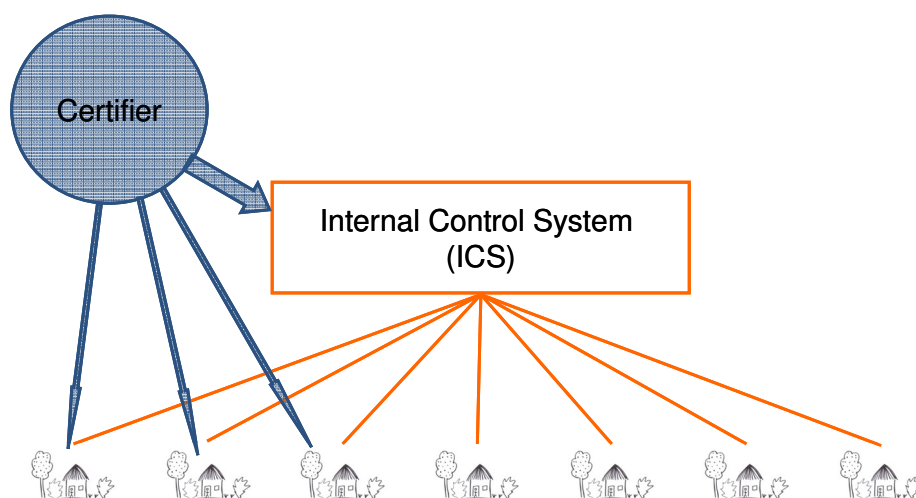
6 External certification

Once internal procedures, i.e. internal inspections and approval process, are completed, the external certifier verifies the degree of compliance of the ICS and gives measures for further improvements.

During this external inspection the following aspects will be checked:

- 1.) The developed and implemented ICS procedures (ICS manual) including the qualification of ICS personnel
- 2.) Check of completed internal inspections and inspection check-lists
- 3.) Interviews with a certain amount of collectors. The amount is determined by the perceived/projected risk situation
- 4.) In addition and independent from the ICS, all pre and post harvest activities which are relevant for FairWild have to be inspected

Role of ICS in the certification process



7 Overview of basic steps for ICS development

This chapter gives advice on how to start with the set up of an ICS, which steps should be taken first and what aspects are most important.

As most important step for laying the foundation of a functioning ICS, begin with developing the internal quality procedures, adapted and suitable ICS forms, and the ICS manual. If a management plan has already been established, the ICS procedures should be incorporated (or likewise an initial ICS manual can be amended into a management plan).

After development of the theoretical framework and documents, find qualified personnel and conduct the necessary trainings in FairWild principles and ICS. In parallel, identify collectors and further train them on principles of sustainable collection and FairWild aspects.

The first year of external inspection and certification should be planned only after the ICS is set up, since otherwise the operation might lose the invested time and money if the external inspector comes to the conclusion that the operation can not yet be certified. Either before or during the first inspection, the certification body will screen and assess the ICS document(s) and most likely offer some comments or conditions for improvement.

Once the ICS is set up and certified, gradually improve the relevant documents such as procedures, forms, work instructions and policies. Also keep on working on the implementation by the ICS staff through trainings, seminars and explanations.

The operation will be rewarded with a well working management and control system over staff and collectors, as well as improved security against unexpected events which can threaten the certification, the resource security and the overall business.

8 References

FairWild Standard Version 2.0. FairWild Foundation, Switzerland 2010.

Revised IFOAM Producer Manual for Setting Up and Harmonizing an Internal Control System (ICS). Lechleitner, F. and Eisenlohr, U., IFOAM, Bonn 2004

Guidance Manual for Organic Collection of Wild Plants. IMO/SIPPO/OSEC, Switzerland 2005, updated 2009.

9 Annex

Internal Inspection Form FairWild

Collector's name	Collector's Code
Internal Inspector:	Date of Inspection
Present during Inspection	

Details of collection areas

Is collector active only in registered collection areas	<input type="checkbox"/> Yes	<input type="checkbox"/> No	How many household members take part in collection?	
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Collection areas	ha	Target plant(s)	Observations (e.g. other collectors, threats to species/habitat)
A			
B			
C			
D			

Yield estimates per collection area

Plant name	How much will be harvested?				What is the potential yield (i.e. overall biomass, overall fruit production, etc.)?			
	Area A	Area B	Area C	Area D	Area A	Area B	Area C	Area D

Note: needs to include quantities collected by all household members (if applicable)

Collection practices

Training has been received	<input type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> remarks:
Collector knowledge on species (identification) is adequate	<input type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> remarks:
The harvest methods used ensure sustainable collection	<input type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> remarks:
Any impact by collection activity on habitat or other species?	<input type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> remarks:
Collector understands principle of sustainable collection	<input type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> remarks::
Internal Collection rules are known / followed?	<input type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> remarks:
Problems detected by the collector about certain plant species			

Post Harvest Measures and Processing

Activity	Good	Acc. with cond.	Not Acc.	Justification/Condition
Processing (drying, packing) Separation of qualities				
Storage No contamination, separation				
Comments				

Do stored plants only originate from own collection?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	Remarks:
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Risk Management contamination

Risk of contamination	Low	Med.	High	Comments
Collection on/near farmland				
Collection near human settlements				
Industry, motorways, wastewater, etc.				
Measure taken to minimise the risk:				

Customary Rights

Topic	Yes	No	Unknown	Comments
Does the collector belong to an indigenous group?				
Are there traditional harvest and use rights for the collector/s?				
Does the collector or his group own the land on which collection takes place?				
Measure taken to avoid conflict with customary rights:				

Benefit Sharing

Topic	Yes	No	Unknown	Comments
Does collector feel adequately included or represented in management planning?				
Does the collector receive adequate benefits for allowing access to resource?				
Measure taken to ensure adequate benefit sharing:				

Child Labour

Topic	Yes	No	Unknown	Comments
Is the collector under 18 years of age? If yes, give age				
Are any children or young people under 18 years of age from the collector's family assisting the collector during collection or processing?				

Are any children or young people under 18 years of age who do NOT belong to the collector's family assisting the collector during collection or processing?				
Are children or young collectors supervised at all times by the collector?				
Does the collector CONTRACT any children or young collectors to assist during collection or processing?				
Do assisting children go to school regularly? Do they assist in collection only during school-free times?				
Is there 100% primary schooling of all children in the collection area or are there deficits?				
If there are children or young collectors assisting, what tasks do they perform exactly and for how many hours per day?				
Measure taken to prevent or phase out prohibited forms of child labour				

General Social and FairTrade Aspects

Topic	Yes	No	Unknown or n/a	Comments
Has the collector received training on social and fair trade aspects of FairWild?				
Is there any discrimination of collectors to join the collectors' group depending on gender, age, ethnic origin, religion, etc.?				
Is the collector always paid on time for his material or are there delays? If delays, give details.				
Is the collector always paid the agreed amount for his material or are there deviations?				
Does the payment cover the collector's and her / his family's basic needs, including some discretionary income?				
Does the collector know what FairTrade Premiums are and what they are used for? Who does inform him/ her?				
Measure taken to improve social and fair trade aspects if there are deficits:				

Approval Recommendations of inspector

Compliance with previous conditions <input type="checkbox"/> good <input type="checkbox"/> partially/acceptable <input type="checkbox"/> missing/not acceptable <input type="checkbox"/> no conditions last year
Compliance this year <input type="checkbox"/> to approve without conditions <input type="checkbox"/> to approve with conditions <input type="checkbox"/> cannot be approved
Conditions (corrective measures) or Explanation: (<i>→ for severe noncompliances, please complete violation form</i>)

Declaration

The collector herewith confirms that he/she complies with the internal collection rules. The collector has noted the set conditions	
Signature Collector	Signature Internal Inspector

Approval Decision by the Organisation

Compliance this year <input type="checkbox"/> approved without conditions <input type="checkbox"/> approved with conditions <input type="checkbox"/> not approved
Additional conditions or sanctions:
Signature Approval Manager