SRP Internal Management System (IMS) Standard for Producer Groups operating under the SRP Standard for Sustainable Rice Cultivation (Group Implementation)

Version 1.0
(Approved December 2020)
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GLOSSARY

**Actors:** All parties participating in the SRP Assurance Scheme v 1.3.

**Assurance Service Provider (ASP):** GLOBALG.A.P., an entity mandated by the SRP to provide assurance-related services on its behalf.

**Auditor:** Person who performs the IMS audit and/or reviews audit reports. An auditor is an individual qualified for auditing the Internal Management System of producer groups to verify compliance with the IMS Standard.

**Continuous improvement:** A series of incremental, documented improvements in the producer group’s operations. Among areas that contribute to continuous improvement of plans are risk assessment; internal and external findings; complaints and appeals records; and review of market requirements.

**External Inspection:** Inspection by a second party for Assurance Level 2 or by a third party for Assurance Level 3. The producer group must contract an SRP Approved Verification Body (VB) to plan and conduct the external inspection. The producer group and VB must agree on costs of the external inspection; individual producers in a group are not directly charged by the VB. A list of SRP-approved verification bodies is available at the GLOBALG.A.P. website (www.globalgap.org).

**Implementer:** Supply chain actors (producers, producer groups, millers, processors, producer organizations and other organizations) who adopt and implement the SRP Standard and participate in the SRP Assurance Scheme.

**Individual producer:** Individual grower or single organization who may own several production sites that do not function as separate functional or legal entities.

**Inspector:** Person performing the inspection/audit and who complies with the requirements as set out in the SRP Assurance Scheme.

**Internal Inspection:** Inspections carried out for each postulant member prior to enrolment as a member of the producer group. The internal inspection forms part of the enrolment procedure. Following member registration, members (and corresponding production site or sites) should be inspected at least once per year prior to verification at Assurance Level 2 or Level 3, against all the relevant SRP requirement points under the SRP Standard.

**Internal Management System (IMS):** A documented set of procedures and processes to be implemented by a producer group to ensure and demonstrate that it can achieve specified requirements. The IMS allows the assurance provider to delegate inspection of individual group members to an identified body within the group.

**IMS Team:** A team formed to guarantee that the IMS is internally evaluated and that all group members receive internal inspection or conduct self-assessment according to the frequency stipulated
in the SRP Assurance Scheme. This team is established with clear separation of roles (overall management, training, internal inspection, compliance decision taking, purchasing).

**Producer Group (Organization):** A group of individuals or businesses, that may be either informal or established as a legal entity. Examples include rice production communities, cooperatives, farmer organizations or millers with contract farmers. Producer groups without a legal entity are expected to follow the same processes as if they were a legal entity, in particular with regard to governance structures to implement the IMS. All group members are required to sign an agreement to comply with the SRP Standard and IMS.

**Self-Evaluation:** Self-evaluation is required at group level in order to assess the main issues to be addressed by its members in order to reach compliance with the SRP Standard and to estimate what changes will be needed from the outset. These changes may require a process of training, coaching and development of action plans.

**Sustainable Rice Platform (SRP) Member:** A legally-constituted organization whose application to join SRP as a Full Member or Observer has been approved by the SRP Secretariat.

**Verification:** Process of providing an Implementer with official SRP Verification, attesting to its status and compliance with the SRP Standard and policies (relevant for Assurance Levels 2 and 3).

**Verification Body:** An organization responsible for inspection of producers according to the SRP Standard. They may have a relationship with the producer (second party) or be independent (third party) and shall operate with inspectors approved by the ASP according to the compliance requirements defined in this document.
1. Introduction

1.1 The SRP Programme

The Sustainable Rice Platform (SRP) is a global multi-stakeholder alliance of over 100 institutional members from public, private, research, civil society and the financial sector. The SRP initiative was originally co-convened by the International Rice Research Institute (IRRI), the United Nations Environment Programme (UNEP) and Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH (GIZ) and is now an independent member association.

SRP works with partners to transform the global rice sector by improving smallholder livelihoods, reducing the social, environmental and climate footprint of rice production; and by offering the global rice market an assured supply of sustainably produced rice.

In 2015 the SRP launched the world’s first voluntary Standard for Sustainable Rice Cultivation, which provides a working definition of sustainability in any rice system and allows sustainability scoring at farm level. In addition, a linked set of SRP Performance Indicators (PI) was made available to enable quantitative monitoring of improvements and impacts resulting from adoption of climate-smart, sustainable best practice under the SRP Standard.

The most up-to-date tools and approaches are available at the SRP website: www.sustainablerice.org:
1. The SRP Standard for Sustainable Rice Cultivation (SRP Standard)
2. The SRP Performance Indicators for Sustainable Rice Cultivation (SRP Performance Indicators)
3. The SRP Assurance Scheme
4. SRP Brand Manual
5. SRP Internal Management System (IMS) Standard for Producer Groups operating under the SRP Standard for Sustainable Rice Cultivation (IMS Standard)
6. SRP Internal Management System (IMS) Guidelines for Producer Groups operating under the SRP Standard for Sustainable Rice Cultivation (IMS Guidelines)
7. SRP Chain of Custody Policy and Standard

SRP and its members work to drive broad-scale uptake of the SRP Standard and tools in both the public and private sectors. The SRP Standard is designed to drive progressive improvement in performance, with the aim to achieve a measurable, transformative impact at sector level.
The SRP-Verified on-pack Label and Assurance Scheme are based on the SRP Standard and provide a system for supply chain actors to procure SRP-Verified rice and make sustainability claims for rice produced using proven, climate-smart sustainable best practices.

1.2 About this document

This document was first drafted in 2017 by UTZ, supported by SRP Working Group 3, under the name “Performance Management System Standard for the SRP Standard for Sustainable Rice Cultivation, Version 1.0”.

In 2019 GLOBALG.A.P. as SRP’s Assurance Service Provider, revised the document as a contribution to the normative document “SRP Assurance Scheme”. The text was subsequently further revised by NEPCon, a member of SRP, and separated into two documents, based on their respective target audiences.

The first of these documents (the current document) is the SRP Internal Management System (IMS) Standard for Producer Groups operating under the SRP Standard for Sustainable Rice Cultivation. This document sets out the formal requirements used by internal and external auditors to assess compliance of the IMS, and against which the IMS can evaluate itself.

The second document is the SRP Internal Management System (IMS) Guidelines for Producer Groups operating under the SRP Standard for Sustainable Rice Cultivation. This document is designed to guide producer groups in the proper function of the IMS to ensure effective and transparent organisation and management of the group.

Both documents are available for download at the SRP website: [www.sustainablerice.org](http://www.sustainablerice.org)

1.3 How does this document relate to the SRP Standard?

It is the responsibility of either the group or individual farmers to demonstrate compliance with the requirements under the SRP Standard. For groups of farmers this can only be achieved by means of a functioning IMS. This document lists the requirements to measure results and identify measures for continuous improvement at IMS level.

To meet the needs of a wide variety of industry and supply chain partners, the SRP Assurance Scheme offers three assurance levels, and has been developed in line with the ISEAL Assurance Code version 2.0, which guarantees the programme’s integrity, transparency and credibility. Each of the three assurance levels is differentiated by its own compliance rules as well as associated claims that Implementers are permitted to make.

Implementers (e.g. Producers/Producer groups, millers, processors, or producer organizations and other organizations) need to adopt and implement the SRP Standard and policies listed below as a minimum, before they can be verified by an SRP Approved VB. Optionally, implementers can call upon the support of a Facilitator. Please note that the SRP Performance Indicators are an optional tool that complement the SRP Standard by measuring impact of adoption; they are not part of the formal verification process.
Producers / Producer Groups / Millers / Processors / Producer organizations may choose the most appropriate assurance level for their own production context. Producers and Producer Groups meeting the compliance requirements of the SRP Standard and policies for their chosen assurance level, may reach either the compliance status “SRP Verified” or “Working toward sustainable rice cultivation”. To maintain the status of ‘working toward sustainable rice cultivation’, annual improvements in performance are expected. For details, refer to SRP Assurance Scheme.

Implementers such as rice millers, processors or producer organizations and other organizations aiming to serve as an SRP Approved VB for Assurance Level 2 must meet all applicable requirements in the SRP Assurance Scheme. The use of the ‘SRP-Verified’ label and associated claims is governed by a Chain of Custody (CoC) model provided by a VB, which must align with the SRP Assurance Scheme and SRP Communication and Claims/Logo Guideline (Annex 7 to the SRP Assurance Scheme).

Upon successful verification by the SRP Approved VB, the Implementer will receive an SRP Verification Statement¹ that specifies the conditions of the chosen assurance level, such as the compliance score, compliance status, verified volume, permitted claims and traceability level.

For each assurance level, the process of verification is described, as well as the rights and obligations for:

a) the Standard Setting Organization (SRP);
b) the Assurance Service Provider (e.g. GLOBALG.A.P.);
c) the Implementer (Producer / Producer Group / Miller / Processor / Producer organization and other organizations);
d) the Facilitator, preparing the Implementer for the inspection / verification / audit; and
e) the SRP Approved VB, conducting the inspection / verification / audit.

The SRP Assurance Scheme further clarifies the three CoC models accepted for logo use and claims for each verification level. The SRP Member Communication and Claim/Logo Guideline (Annex 7 to the Assurance Scheme) sets the rules for use of on/off-pack product claims and logo use relating to the SRP Standard. This claims policy follows the ISEAL Sustainability Claims Good Practice Guide² as well as specific rules included in the SRP Standard.

1.4 Requirements structure and scoring

The IMS Standard comprises 14 requirements under the responsibility of the IMS Team/Manager. It allows for stepwise compliance to encourage and reward progress toward full compliance. All requirements have several possible levels of compliance.

Each level of compliance corresponds to a number of points. The highest compliance level in most requirements scores 3 points. Most requirements have additional intermediate compliance levels with 1 or 2 points. All requirements have made explicit the lowest level of compliance, scoring zero points. There are a few exceptions to the maximum scores per requirement. One requirement (No. 13) allows for a ‘non-applicable’ response, if no service provider is used.

¹ Implementers applying Assurance Level 1 will not receive an SRP Verification statement
The total score against the IMS Standard is presented on a 0-100 scale. This score is based on the total number of points scored, divided by the maximum achievable number of points (42), multiplied by 100.

\[
\text{Score Standard (0-100)} = \frac{\text{Total number of points corresponding to actual performance}}{\text{Maximum number of points possible}} \times 100
\]

The essential compliance level (threshold) for each requirement in the IMS Standard is indicated by an asterisk (*) next to the corresponding level of compliance. A claim of sustainable rice cultivation can only be made if all mandatory thresholds are met, and a minimum score of 90% is achieved for the SRP Standard and 75% for the IMS Standard.
## 2. Internal Management System Requirements

For each IMS requirement an essential minimum performance level has been defined. This level is indicated for each requirement by an asterisk (*) next to the level of performance. Words in **italic-bold** are defined in the glossary.

<table>
<thead>
<tr>
<th>No.</th>
<th>IMS-element</th>
<th>Requirement</th>
<th>Compliance level</th>
<th>Points</th>
</tr>
</thead>
</table>
| 1   | Legality, establishment and organization of IMS | • Documentation shall be available to demonstrate the legal standing of the **producer group** and its legal right to carry out agricultural production and/or trading and be able to legally contract with and represent the producer members/production sites.  
• An organizational chart, description of functions and responsibility for the **IMS Team** is in place; a simple model and minimum requirements for each role is available in Annex 1.  
• The documented set of procedures and processes that a group will implement shall be available to ensure it can achieve its specified requirements, including for **continuous improvement**. These are as follows:  
  - Members enrolment and exclusion procedure  
  - Internal Approval procedure  
  - Grievance mechanism/ procedure  
  - Members’ appeal procedure  
  - Complaint handling procedure  
  - Internal inspection procedure  
  - Traceability / product handling procedure  
• When the **producer group** does not have legal status, it must comply as specified in the definition. | a) The legal entity has been granted the legal right to carry out agricultural production and/or trading and be able to legally contract with and represent the producer members/production sites. An organizational chart must be available indicating all IMS staff are in place with roles designated and implemented. Responsibilities for key tasks and the qualifications required are identified. The functions are described, assigned and shared with the concerned officer. A documented set of procedures and process are available.  
  
  b) A simple organizational chart is in place with details according to assigned persons and their functions (job descriptions are not required). A documented set of procedures and process is available.  
  
  c) A simple organizational chart is in place with details according to assigned persons and their functions (job descriptions are not required). A documented set of procedures and process is not available.  
  
  d) Not clearly identifiable as a legal entity and no available organizational chart and description of functions are available. | 3 |
<p>|     |             |             |                  | 2*     |
|     |             |             |                  | 1      |
|     |             |             |                  | 0      |</p>
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<th>No.</th>
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<th>Points</th>
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</table>
| 2   | Impartiality     | • All IMS staff have signed and understood the meaning of a conflict of interest declaration.  
• The declaration includes a clause that s/he cannot inspect or approve a group member with whom s/he has a potential or actual conflict of interest.  
• IMS staff also commit to declare any such perceived or actual conflict of interest.  
• All declarations are verified by the IMS Manager. | a) All IMS staff have signed the declaration.  
b) Some IMS staff members have signed the declaration.  
c) None of the IMS staff have signed the declaration. | 3  
1*   
0    |
| 3   | Producer list    | A complete list of producers participating in the programme is retained centrally and updated at IMS level. The list documents the following information for each producer:  
- producers name, contact details, group ID number  
- land status (owned or leased)  
- location of production area and GPS coordinates,  
- total growing/production area and/or quantity for each registered product  
- entry date to the programme  
- production (previous yields since entry date and current year’s estimate) validated by IMS | a) A complete and up-to-date producer list is available  
b) The producer list is incomplete or not updated.  
c) No producer list in place or the producers list information is not correct. | 3  
2*   
0    |
<table>
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<tr>
<th>No.</th>
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<th>Compliance level</th>
<th>Points</th>
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</table>
| 4   | Producers agreements | • All individual agreements with each producer are retained centrally and updated at IMS level; each producer receives a copy of their agreement.  
• The agreement with each producer contains at least the rights and obligations of both parties including termination of membership, and the right to appeal the decision following the producer group’s stipulated grievance procedure.  
• The agreement is in writing and signed or follows the procedure established for agreements (e.g. recorded, witnessed).  
• The agreement and consequences of enrolment must be understood by the producers. | a) Signed agreements between each producer and the group legal entity are completed for all registered members. Members have a copy of their agreement and are well informed of their enrolment, responsibilities and consequences.  
b) The agreements are incomplete or members do not have a copy of their agreement.  
c) No individual agreements in place. | 3 |
| 5   | Gender equality     | • A written gender equality promotion policy is communicated to group members/workers  
• A committee is appointed, responsible for implementation, monitoring and evaluation of measures to promote gender equality and women’s empowerment  
• At least twice per year a meeting is organized including all IMS management staff and group members to review progress on enhancing gender equality and women’s empowerment | a) All three requirements are in place and followed  
b) Two out of three of the requirements are in place and followed.  
c) None or only one of the three requirements is in place | 3  
2*  
0 |
<table>
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<th>No.</th>
<th>IMS-element</th>
<th>Requirement</th>
<th>Compliance level</th>
<th>Points</th>
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</table>
| 6   | Risk assessment | • A risk assessment is carried out in accordance with a documented risk assessment procedure and conducted to assess the producer’s risk profile.  
• The risk assessment is reviewed annually.  
• The results and follow-up actions are documented. | a) A risk assessment is carried out in accordance with the pre-agreed procedure, reviewed annually and documentation is complete.  
b) A risk assessment is carried out, but not in full accordance with the procedure, or documentation is incomplete.  
c) No risk assessment has been carried out or no annual review has taken place. | 3*     |
| 7   | Internal inspection | • A system for internal inspection is in place and implemented.  
• New producers must be inspected individually in the first year.  
• All producers must be inspected individually (or peer to peer reviewed) before the first group audit.  
• A clear mechanism determines the frequency of internal inspections for existing members based on a risk profile clearly defined and documented in the risk assessment.  
• Individual internal inspection results are documented in the Individual Farmer Reports (using the SRP Data Collection Tool) and in the Group Summary Report. Reports contain producer identification, previous production and current estimation, producers’ signature, inspection date, inspector’s name, non-conformities identified, corrections and corrective actions, approval or sanction decision. | a) A system for internal inspections is in place and implemented according to the requirements.  
b) A system for internal inspections is partly in place or implemented.  
c) No such system is in place or implemented. | 3*     |
<table>
<thead>
<tr>
<th>No.</th>
<th>IMS-element</th>
<th>Requirement</th>
<th>Compliance level</th>
<th>Points</th>
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</table>
| 8   | Approval and sanction system | The IMS has an approval and sanction system in place, including an approval and sanction manager or committee, a procedure for decision-making and corrective measures, a documented and signed up-to-date decision for all inspected producers and communication of all decisions to the respective producers. It also includes a procedure for the producer’s right to appeal, which has been clearly communicated to all members of the producer group. | a) The system is in place and implemented with all mentioned elements.  
b) The system is partly in place or implemented.  
c) No such system is in place or implemented. | 3      |
| 9   | Self-evaluation              | • **Self-evaluation** process at IMS level shall be available in order to assess key constraints to be addressed in order to reach compliance with the SRP Standard and to estimate what changes will be needed from the outset.  
• **Self-evaluation** may involve a process of training, coaching and development of action plans.  
• **Self-evaluation** will be accomplished by farmer group members who have received relevant and adequate training with updated IMS training records to show for it.  
• The principle of impartiality shall be implemented for **self-evaluations** conducted by IMS staff.  
• Results are documented and made available to the external auditor prior to the audit. | a) A self-evaluation as per required process and procedures has been carried out; the results have been documented and made available to the auditor prior to the audit.  
b) A self-evaluation has been carried out and the results have been documented but not made available to the auditor prior to the audit.  
c) A self-evaluation has been carried out.  
d) No self-evaluation has been conducted. | 3
2*  1*  0      |
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<th>No.</th>
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<th>Points</th>
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| 10  | Group management plan       | • A group management plan is in place and updated annually, including all actions taken to address issues identified in the risk assessment, internal inspection reports (documented in the Group Summary Report (using the SRP Data Aggregation Tool), self-evaluation reports (documented in the IMS Standard Checklist), and inspection findings.  
• Group management plan includes as a minimum, soil fertilization, integrated pest management and social and gender equality policy.  
• The actions are implemented and documented.  
• The annual plan should be related to SMART results (Specific, Measurable, Assignable, Realistic and Time-related).  
• A set of data needs to be collected to determine the score and threshold compliance against the SRP Standard. These data should be available and stored in the office of the IMS. | a) A group management plan is in place and implemented in accordance with all requirements; the annual plan is related to SMART results (Specific, Measurable, Assignable, Realistic and Time-related); there are a set of data collected to determine the score and threshold compliance against the SRP Standard and available in the office of the IMS.  

b) A group management plan is in place and is partly implemented; the plan is not related to SMART results; no data is collected and available  
c) No group management plan is in place. | 3     |

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</table>
| 11  | Chain of Custody Requirements       | • Chain of Custody models: Identity Preservation (IP), Product Segregation (Seg) and Mass Balance (MB)  
• Control procedures are established and documented, including a flowchart of the products from their origin, procedure to record production and yields, product movement, product storage, sales and resale.  
• Risk points must be identified, and a mitigation plan must be defined to mitigate mixing risk for each chain.  
• The Chain of Custody system requires that all transaction documentation (purchase invoices, sales invoices, other sales-related and dispatch documentation) shall be recorded at IMS level.  
• The IMS shall demonstrate that SRP-verified rice is handled in its facilities that follow the requirements in Annex 2 SRP COC Policy, the Chain of Custody Models. If MB is used as Chain of Custody model, then it shall be implemented according to Annex 3 of the SRP COC Policy. | a) Compliant procedures are in place; relevant staff are well aware of the procedures and these are implemented in practice.  
b) Paddy and rice products are handled and sold with the compliant claim according to the Chain of Custody model chosen.  
c) No compliant Chain of Custody system is in place nor implemented. | 3 |
| 12  | Complaint management                | Producer groups or individual producers with multiple sites have a system to ensure that complaints are received, registered, identified, investigated, followed up and reviewed as per procedures listed below:  
• Members enrolment and exclusion procedure  
• Internal Approval procedure  
• Grievance mechanism/ procedure  
• Members’ appeal procedure  
• Complaint handling procedure  
• Internal inspection procedure  
• Traceability / product handling procedure | a) An effective, fully compliant complaint management system is in place and documented.  
b) The complaint handling system is in place but not effectively implemented in practice.  
c) No complaint handling system in place | 3 |
<p>|     |                                     |                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                    | 1*     |
|     |                                     |                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                    | 0      |</p>
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<th>Compliance level</th>
<th>Points</th>
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<tbody>
<tr>
<td>13</td>
<td>Service providers</td>
<td>Full records are maintained to demonstrate that the competency of any service providers has been assessed and meets the requirements of the SRP Standard. The work of service providers should follow relevant requirements and procedures in accordance with the applicant’s IMS; such requirements must be specified in service level agreements or contracts.</td>
<td>a) No service providers used.</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>b) Records to demonstrate that the competency of service providers has been assessed and meets the requirements of the SRP Standard are available. Service agreements/contracts are in place.</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>c) Records to demonstrate the competency of service providers are available but incomplete.</td>
<td>1*</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>d) No service provider assessment system in place.</td>
<td>0</td>
</tr>
<tr>
<td>14</td>
<td>Claims and use of SRP-Verified Label</td>
<td>In making on or off-pack claims and in using the SRP-Verified Label, the producer group and supply chain partners comply with the SRP Assurance Scheme (Member Communication and Claims/Logo/Label Guidelines, Annex 7) and the Chain of Custody Policy and Standard.</td>
<td>a) All claims and usage of the SRP-Verified Label comply with the SRP Assurance Scheme Member Communication and Claims/Logo/Label Guidelines, and the SRP’s Chain of Custody (CoC) Policy and Standard</td>
<td>3*</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>b) Logo/label use and product claims do not fully comply with the Assurance Scheme Member Communication and Claims/Logo/Label Guideline and CoC Policy and Standard.</td>
<td>0</td>
</tr>
</tbody>
</table>
Annex 1: Model of organizational chart for IMS

<table>
<thead>
<tr>
<th>Roles and Function</th>
<th>Responsibility</th>
<th>Minimum Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>IMS Manager</td>
<td>Oversee the entire IMS including overall management and group governance to</td>
<td>Individual who has received SRP accredited training and who understands the SRP</td>
</tr>
<tr>
<td></td>
<td>ensure effective and efficient implementation of the IMS.</td>
<td>requirements, including the SRP Standard and Assurance Scheme.</td>
</tr>
<tr>
<td>Internal Approval</td>
<td>Approve enrolment of new members based on internal inspection results and</td>
<td>A person or group who understand the group’s operation and governance and is familiar</td>
</tr>
<tr>
<td>Manager/ Committee</td>
<td>other supporting documents including but not limited to legality, producer</td>
<td>with its procedures. These persons commit to acting impartially so that decisions are</td>
</tr>
<tr>
<td></td>
<td>consent, etc. Review internal inspection results and decide the consequences</td>
<td>consistent and accepted as fair.</td>
</tr>
<tr>
<td></td>
<td>of negative assessments, including potential termination of group membership.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Review complaints and appeals received from group members or other parties.</td>
<td></td>
</tr>
<tr>
<td>Training Unit</td>
<td>Identify training needed for members on specific requirements.</td>
<td>Group of people with SRP-accredited training skills, who understand the SRP</td>
</tr>
<tr>
<td></td>
<td>Develop training programme for members.</td>
<td>requirements, including the SRP Standard.</td>
</tr>
<tr>
<td></td>
<td>Implement training programme and review its effectiveness.</td>
<td></td>
</tr>
<tr>
<td>Internal Inspection</td>
<td>Conduct internal inspection on each group member. Analyse internal inspection</td>
<td>Group of people with recognized inspection skills, who understand the SRP</td>
</tr>
<tr>
<td></td>
<td>results and identify key areas for improvement as a baseline for development of</td>
<td>requirements, including the SRP Standard.</td>
</tr>
<tr>
<td></td>
<td>a training plan.</td>
<td></td>
</tr>
<tr>
<td>SalesCommercialization</td>
<td>Identify supply chain risks at producer level in order to contribute to a</td>
<td>A person or group of people who understand the principles of traceability and chain of</td>
</tr>
<tr>
<td>Unit</td>
<td>management plan to mitigate traceability risk. Record purchase and sales data</td>
<td>custody.</td>
</tr>
<tr>
<td></td>
<td>and ensure the traceability system is implemented robustly.</td>
<td></td>
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</table>