
Guidelines for Producer Groups operating under the SRP Standard for Sustainable Rice Cultivation (IMS Guidelines)



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Version information

This document has been revised from SRP IMS Guidelines v1.0 to align with SRP Assurance Scheme 2.0 on its system, definitions and terminology. The primary change involves the removal of the Assurance Service Provider (ASP) as the Assurance Scheme v 2.0 will be managed directly by the SRP Secretariat from 1 January 2024. The IMS Guidelines itself is unchanged. This version has undergone a comprehensive review and was approved by the SRP Technical Committee in 24 November 2023.

About the Sustainable Rice Platform (SRP)

The Sustainable Rice Platform e.V. (SRP) is a global multi-stakeholder alliance comprising over 100 institutional members from public, private, research, civil society and the financial sector. Co-convened by the International Rice Research Institute (IRRI), the United Nations Environment Programme (UNEP) and private sector partners. SRP works with its members and 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.

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1. Glossary

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

Arable layer: a fertile layer that contains a mix of organic matter, minerals, and nutrients necessary to support plant life, where most of the biological and chemical soil processes occur, and it plays a vital role in providing plants with water, nutrients, and a medium for root growth. It is the most fertile layer for plant growth and the most susceptible to damage by external factors.

Assessment*: The combined processes of audit, review and decision on a producer's or producer group's compliance with the requirements of a standard. This can be:

Internal assessment: Assessment of compliance with the SRP Standard for Sustainable Rice Cultivation which peers, members of an IMS Team or an appointed external party (other than an approved CAB) conducts on behalf of the producer.

Self-assessment: Assessment of compliance with the SRP IMS Standard which the producer or producer group conducts themselves to evaluate the performance and effectiveness of the IMS itself.

Third-party Assessment: Assessment activity that is performed by an approved CAB that is independent of the producer or producer group being assessed.

Audit*: A component of an assessment. A systematic, documented process for obtaining records, statements of fact or other relevant information and assessing them objectively to determine the extent to which specified requirements are fulfilled.

Auditor*: Person who performs the audit

Chain of Custody: The custodial sequence that occurs as ownership or control of the material supply is transferred from one custodian to another in the supply chain.

Conformity Assessment Body (CAB): An entity that can issue a third-party statement that fulfilment of specified compliance requirements has been demonstrated.

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

Data Governance*: The overall management of the availability, usability, integrity, and security of the data gathered and used by an organization. A data governance programme includes a governing mechanism, a defined set of procedures, and a plan to execute those procedures.

Farmer Organization (FO): formal or registered membership-based collective action institution serving its members, which commissions and pays for the SRP verification audit. They shall become SRP members and SRP membership and farmer registration dues are payable by the farmer organizations.

Internal Audit*: An internal, systematic, documented process, conducted on themselves by a producer, producer group or CAB, for obtaining relevant information and assessing objectively to determine the extent to which specified requirements are fulfilled.

Internal Assessment: The assessment of a producer's compliance with the SRP standard which peers, members of an IMS Team or an appointed external party (other than an approved CAB) conducts on behalf of the producer.

Internal Management System (IMS)*: In group assurance, the documented set of procedures and processes that a group will implement to ensure it can achieve its specified requirements.

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).

Logos: Both SRP-Verified Label and SRP Organizational Logo.

'Label' refers to the SRP-Verified Label indicating the integrity of claims to sustainable best practices according to the SRP Standard, as verified through the SRP Assurance Scheme. The SRP-Verified Label symbolizes a seal of approval.

'Logo' refers to the SRP Organization Logo, used to uphold SRP's brand value and recognition and to ensure consistent application across all SRP programs, tools and communication materials.

Non-compliance* (synonym: non-conformity): An identified occurrence of non-conformance with one requirement of a standard, i.e. a missed threshold, identified as part of an assessment.

Producer (synonym: farmer): The legally responsible individual or business in terms of practices, processes and sales of rice under the scope of verification

Producer Group: formed by individuals or businesses, either as a legal entity or informally. Such groups may 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 an Internal Management System (IMS).

Risk*: The chance of something happening that will have an impact on objectives. It is measured in terms of a combination of the probability of an event and the severity of its consequences.

Risk Assessment*: a method of evaluating the potential and actual impact of sustainability standard on environmental, social and economic issues.

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.

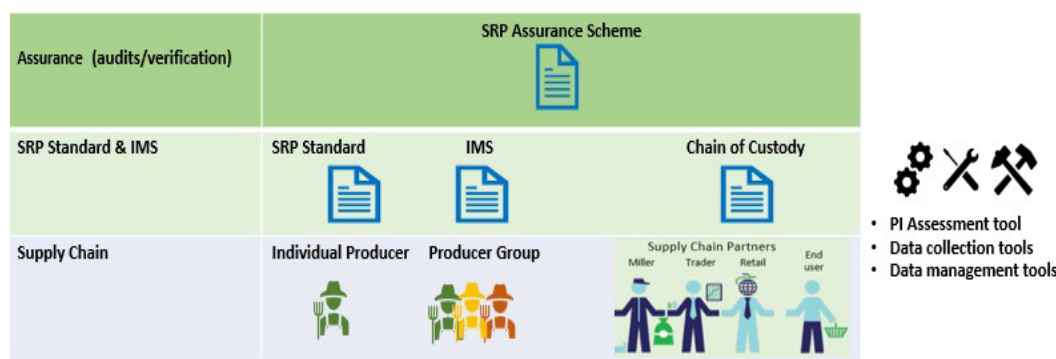
Verification: Issuance of a statement that fulfilment of specified compliance requirements has been demonstrated.

*Note: Definitions marked * are adapted from the ISEAL Assurance Code of Good Practice v 2.*

2. INTRODUCTION

2.1. The SRP Programme

- 2.1.1. The Sustainable Rice Platform (SRP) is a global multi-stakeholder alliance with over 100 institutional members led by UN Environment Programme (UNEP) and the International Rice Research Institute (IRRI), together with partners from the public and private sectors, research, nonprofit organizations and the international development community.
- 2.1.2. Established in 2011, SRP aims to secure wide-scale adoption of sustainable farming practices among rice farmers around the world. In 2015 the SRP launched the world's first global 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 (PIs) enable collection of farm data to quantify and verify improvements and impacts.
- 2.1.3. 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.
- 2.1.4. The most up-to-date tools and approaches are available at the SRP website: www.sustainablerice.org.



- 2.1.5. 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.
- 2.1.6. 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.
- 2.1.7. Launched in September 2020, the system helps boost incomes for smallholder farmers and enhances their market access. Independent audits provide supply chain actors with a robust and credible framework to de-risk their supply chains, while the on-pack SRP-Verified Label empowers consumers to choose products that directly support efforts to boost farmer livelihoods while reducing the social and environmental impact of rice farming.

2.2. About this document

- 2.2.1. This document is intended as a companion to the document 'SRP Internal Management System (IMS) Standard for Producer Groups operating under the SRP Standard for Sustainable Rice Cultivation v 1.1' or IMS Standard. The original IMS Standard first drafted in 2017 by UTZ, supported by a SRP Working Group, 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 Preferred by Nature, a member of SRP, and published as two separate documents, based on their respective target audiences.

- 2.2.2. The first of these documents is the 'SRP Internal Management System (IMS) Standard for Producer Groups operating under the SRP Standard for Sustainable Rice Cultivation' (in short IMS Standard). This document sets out the formal requirements used by internal and third-party assessment auditors to assess compliance of the IMS, and against which the IMS can evaluate itself.
- 2.2.3. The second document (the current document) is the 'Guidelines for Producer Groups operating under the SRP Standard for Sustainable Rice Cultivation' (in short IMS Guidelines). 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.
- 2.2.4. In December 2023 the SRP Secretariat published revised the IMS Guidelines together with the IMS Standard v1.1.

2.3. How does this document relate to the SRP Standard?

- 2.3.1. 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.
- 2.3.2. SRP Actors (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 CAB. Optionally, SRP actors 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.
- 2.3.3. In details, rules for assessing producer groups and IMS can be found in SRP Assurance Scheme, section 8 "Additional Rules for Assessment of Producer Groups and IMS".

Normative Documents	Applicable to:
SRP Standard	All Producer and Producer Group
IMS Standard	Single owner producer with multi-site farms / Producer Group
SRP Assurance Scheme	All Actors

3. WHY IMS IS IMPORTANT?

3.1. Basic conditions

- 3.1.1. In order to ensure compliance among its members, the producer group must establish an IMS to provide transparent oversight and ensure with confidence that individual producers within the group meet the requirements of the SRP Standard. At the same time, the IMS plays a vital role in supporting learning for individual producers.
- 3.1.2. The following conditions help to build external confidence that a producer group conforms to agreed standards:
- **Documentation and records:** How well documented are the group structures and individual group member practices? How accurate and complete are the production, chain of custody and management records?
 - **Group governance:** How effective is the governing mechanism to define and implement necessary procedures? How are decisions made? Who should decide on approval or removal of members?
 - **Risk assessment:** How well are key risks identified at the group member and management levels? To what extent are they integrated into training and communication (continuous improvement)?
 - **Knowledge and understanding:** How well do individual producers understand what is expected of them as part of the producer group? How well does the group management and all of its individual members understand the full SRP Standard requirements? Training is an important tool to achieve this understanding.
 - **Continuous improvement:** How effective are the internal checks on performance and how strong are the repercussions for non-conformance?
- 3.1.3. Each group will differ in the way that it combines these conditions to deliver confidence. As a result, auditors must show flexibility when assessing the level of confidence in the level of compliance of a group and its members. For example, a group that maintains excellent records and a high level of knowledge may not require strict internal sanctions to establish trust and confidence in the integrity of its management system.

3.2. Document control and record-keeping

- 3.2.1. Extensive record-keeping imposes a major administrative burden on producer groups. Nevertheless, efficient and externally credible group operations depend fundamentally upon this requirement. Individual producers should not be overburdened with documentation; however, at the group level written records are the most credible way to verify compliance and are essential to enable auditors to compare reported and observed practices. Group management may use a range of digital data collection tools to collect and analyse farm data.
- 3.2.2. The IMS may opt not only to collect data on behalf of individual producers but also to support producers (through Internal Assessment) in analysing their own farm enterprise data, to help improve their efficiency, productivity and profitability.
- 3.2.3. The minimum level of record-keeping covering the relationship between the group management and its individual producers includes at least the following:
- Agreements between the group and producers.
 - List of producers.
 - Maps of production areas where applicable.
 - Records of sales, purchases, processing and transportation including text of claims compliant with the selected CoC model.
 - Internal assessment reports.
 - Records of non-conformities, sanctions and follow-up action arising from both internal and third-party assessment.

- Complaints and appeals.
- Approval and sanction system.
- Group management plan.
- Social policy, including but not limited to gender equality promotion policy.

Minimum records at the individual producer level include the following:

- Crop calendar and production records.
- Records of inputs used.
- Sales records.
- Integrated pest management.
- Soil fertilization.
- Service provider (if any).

3.2.4. Should the producer be unable to handle records personally, group management should take over recording requirements for inputs, pest and disease monitoring, sales and produce purchased from the producer.

3.3. Group governance

3.3.1. Group governance is key to effective operation of the IMS. Producer Groups without a legal entity may join the SRP programme through engagement with Sponsor Organisation OR assign a group administrator/representative for the purpose of applying SRP membership as Farmer Organization (FO), signing a verification service agreement with the CAB and run other IMS functions. The group administrator/representative must agree to take legal responsibility for development and implementation of the group's IMS and ensure that all members are in compliance with the relevant mandatory provisions of the SRP Assurance Scheme, the SRP Standard and IMS Standard. All group members are required to sign an agreement to comply with the SRP Assurance Scheme, SRP Standard and IMS Standard with the group administrator/representative.

3.3.2. Irrespective of juristic status, IMS requires the following basic elements of good governance:

- Members enrolment and exclusion procedure.
- Internal approval procedure.
- Grievance mechanism & complaint handling procedure.
- Members' appeal procedure.
- Internal assessment procedure.
- Traceability & product handling procedure.
- Gender equality policy.

3.4. Risk assessment

3.4.1. Risk assessment is the process of identifying and analysing potential future events or decisions that may negatively impact individual producers, the group, or the environment (i.e., risk analysis); and making judgments on the tolerability of the risk on the basis of a risk analysis, while also considering influencing factors (i.e., risk evaluation). A risk assessment determines possible non-conformances, their likelihoods and consequences, and the group's tolerances for such consequences. The results of this process may be expressed quantitatively or qualitatively. Risk assessment is an integral part of a broader risk management strategy to help eliminate any potential non-conformances.

3.4.2. The IMS must maintain an intimate understanding of the culture of its members as well as the field conditions in which they operate. The IMS must conduct a risk assessment at regular intervals to be able to develop an updated risk mitigation plan. The risk assessment outcome can be used to develop or update an annual management plan and internal assessment plan for continuous improvement.

3.5. Knowledge and understanding

- 3.5.1. Based on the risk assessment or needs assessment, a support programme can be developed to improve producer scores against the SRP Standard. Selection of IMS team members is important and should be competency-based. A training programme should be developed to build team capacity and upgrade individual qualifications as needed. All trainings should be documented; a template is provided in [Annex 1](#).

3.6. Continuous improvement

- 3.6.1. Continuous improvement requires learning from risk assessments and other processes to drive a series of small changes or improvements in the group's operations. Over time, these cumulative changes help to build a stronger and more efficient group. Continuous improvement is grounded in the process of self-reflection: open and critical examination of the group's operations to discover opportunities for improvement, even on a small scale.
- 3.6.2. Continuous improvement does not happen spontaneously; it results from a shared planning process (plan-do-check-act cycle¹) for which time must be dedicated. All staff and group members (men and women) – anyone involved in the group's operations – should be included in this planning process. The following information that can be used to support continuous improvement planning:
- Self-assessment.
 - Risk assessments.
 - Internal assessment findings.
 - Third-party assessment findings.
 - Complaints and appeals.
 - Review of market requirements.
- 3.6.3. Continuous improvement should be recorded and reported via the annual management plan, using SMART² indicators (Specific, Measurable, Achievable, Relevant and Time-Bound). A set of data needs to be collected to determine score and threshold compliance against the SRP Standard; these data should be stored in the IMS office and be available for audit.
- 3.6.4. The IMS should develop an internal quality manual (in local language) covering key criteria of the SRP Standard where involvement of producers is needed to ensure group compliance with the SRP Standard. This can be presented in a compact form using clear language to ensure a common understanding among producers. If the producer group wishes to measure group performance using the SRP Performance Indicators, these can also be incorporated within the internal quality manual and internal assessment form.
- 3.6.5. The SRP Performance Indicators offer a measurement tool to complement the SRP Standard. A set of Performance Indicator data needs to be collected as part of compliance with the SRP Standard.

¹ <https://en.wikipedia.org/wiki/PDCA>

² https://en.wikipedia.org/wiki/SMART_criteria

4. ESTABLISHING THE IMS

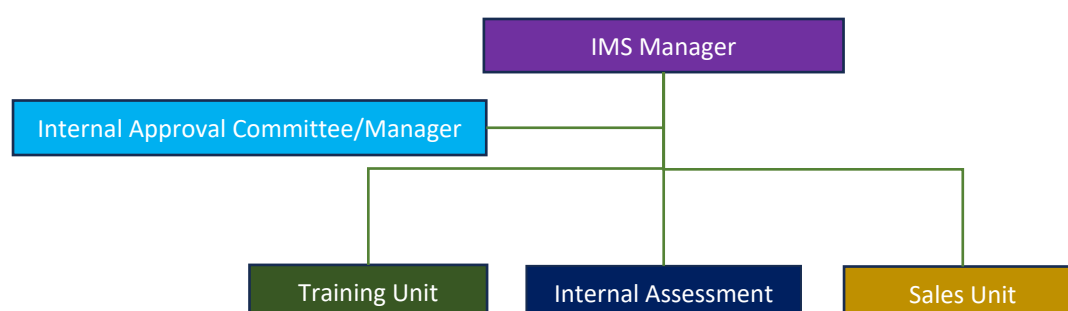
This chapter provides guidance for establishing an IMS. The text and associated Annexes are not prescriptive, aiming only to provide basic models and tools to establish the main elements of a functioning IMS.

4.1. Legality

- 4.1.1. It is desirable that the producer group has legal standing entitling it to become SRP members and enter into a contractual relationship with an approved SRP CAB through the SRP's 'Verification Service Agreement' (VSA). This producer group formed a Farmer Organisation (FO).
- 4.1.2. All documentation shall be available to demonstrate the producer group's legal standing, its right to carry out agricultural production and/or trading and its ability to represent and contract with the group's members and third parties.
- 4.1.3. If the producer group does not have legal status, it must nevertheless be qualified as stipulated in Section 3.3 and is expected to follow the same processes as if they were a legal entity, in particular with regard to governance structures to implement the IMS.
- 4.1.4. If the producer group does not have legal status, it shall designate a legal representative specifically for the purpose of signing a verification service agreement with the CAB. The producer group can collaborate with a Sponsor Organisation that is also an SRP member. The designated representative of the group must willingly agree to take legal responsibility for development and implementation of the group's IMS. They are required to ensure that all members are in compliance with the SRP Assurance Scheme, SRP Standard and IMS Standard. All group members are required to sign an agreement with the legal entity to comply with the SRP Assurance Scheme, SRP Standard and IMS Standard under the group administrator/representative.

4.2. Establishment and organisational structure

- 4.2.1. The IMS should be established and structured to allow it to provide systematic support to group members in implementing the SRP Standard, measure results and identify measures for continuous improvement. Organisational structures may differ according to needs and local culture; however, the IMS will incorporate common basic administrative and structural components as illustrated in the model show below. [Annex 2](#) defines the function and responsibilities of each component in the organization.
- 4.2.2. The producer group must define the function and responsibilities of individuals who are assigned to serve in each of the components within the IMS. Individuals should be selected based on whether they meet the qualifications and possess the competencies required for the component in which they will serve. Training needs for IMS staff at an early stage to supplement their competencies.



Roles and Function	Responsibility	Minimum Requirements
IMS Manager	Oversee the entire IMS including overall management and group governance to ensure effective and efficient implementation of the IMS.	Individual who has received SRP official training on SRP Standard and Performance Indicators (SPI), who understands the SRP IMS Standard and SRP Assurance Scheme.
Internal Approval Manager/ Committee	<ul style="list-style-type: none"> - Approve enrolment of new members based on internal assessment results and other supporting documents including but not limited to legality, producer consent, etc. - Review internal assessment results and decide the consequences of negative assessments, including potential termination of group membership. - Review complaints and appeals received from group members or other parties. 	<p>An individual or group of persons who understand the group's operation and governance and is familiar with its procedures.</p> <p>These persons commit to acting impartially so that decisions are consistent and accepted as fair.</p>
Training Unit	<ul style="list-style-type: none"> - Identify training needed for members on specific requirements based on internal assessment and members request. - Develop training programme for members. - Implement training programme and review its effectiveness. 	Group of people who understand SRP Standard and Performance Indicators (SPI) and has been trained by SPI authorized trainer.
Internal Auditor	<ul style="list-style-type: none"> - Conduct internal assessment and could also self-assessment on each group member. - Analyse self-assessment and internal assessment results and identify key areas for improvement as a baseline to develop a training plan. 	Group of people with recognized assessment skills, who understand SRP Standard and Performance Indicators (SPI) and has been trained by SPI authorized trainer.
Sales/ Commercialization Unit	<ul style="list-style-type: none"> - Identify supply chain risks at producer level in order to contribute to a management plan to mitigate traceability risk. - Record purchase and sales data - Ensure the traceability system is implemented robustly. 	A person or group of people who understand the principles of traceability and Chain of Custody standard requirements.

4.3. Impartiality

- 4.3.1. Impartiality requires decisions to be based on objective criteria rather than on the basis of bias, prejudice, favors or personal benefit. It is important for IMS staff to understand, respect and uphold the principle of impartiality to avoid potential conflicts of interest, and as a critical factor in the long-term stability of the IMS and the producer group which it serves.
- 4.3.2. All IMS staff are required to sign a conflict-of-interest declaration (see [Annex 3](#)) to declare any perceived or actual conflicts of interest. 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. The declaration is considered as a commitment of IMS staff to ensure the impartiality of the system. All declarations should be verified by the IMS Manager.
- 4.3.3. Training activities, inspections and approvals must be conducted by different people within the IMS to avoid conflicts of interest though separation of function. Approval and sanction decisions may be taken either by one person or a group of qualified group members (Internal Approval Committee), with the latter as the recommended option.

4.4. Producer engagement

- 4.4.1. As part of the IMS establishment process, the producer group must ensure that the group and IMS is competent to undertake its own assurance process. It is therefore critical to engage from the outset with producers and gain trust and commitment to the IMS from all group members, before attempting to secure producer agreements. Once this trust and commitment is evident, the IMS can enter into individual agreements with each producer; these agreements should be filed and stored securely at the IMS office. The producer must be provided with their copy of the agreement so that they can review and understand their individual responsibilities and consequences of enrolment in the SRP programme.
- 4.4.2. Agreements between the group and its members define the relationship between the producer and the IMS and ensure that producers commit and understand their rights and responsibilities as group members. Each member of the group must provide written consent to participate as a member of the group and to abide by its rules. Consent declarations, including dates and descriptions, must be retained on file. Members must be made fully aware of the principles of democratic management and follow the principle of gender equality. A common understanding and consensus on all these norms must be established among group members.
- 4.4.3. It is important that agreements with producers allow members to resign or to appeal against any finding of non-conformance and resulting sanctions, which may include expulsion from the group. Members must be made aware of their rights, responsibilities and consequences associated with group membership. The agreement should be in writing in a language that is understandable to producers and signed following an agreed procedure (e.g., recorded and witnessed).
- 4.4.4. The IMS must establish a clear and credible grievance mechanism for its members in case of dispute, as well as an appeal procedure to protect members' rights as defined in the producers' agreement. See [Annex 4](#) for an example of a grievance mechanism.
- 4.4.5. Following signature of a producer agreement, enrolled producers should be listed in an 'SRP Group Members Registry' (GMR). See [Annex 5](#) for a sample template, GMR should use SRP template. Complete list of producers participating in the programme must be centrally filed at the IMS office. As a minimum, the list must contain the following information:
- a) Producer's name,
 - b) contact details,
 - c) group ID number
 - d) Land tenure status (owned or leased)
 - e) Farm location/address
 - f) GPS coordinates: Longitude & Latitude
 - g) Production area and/or quantity for each registered product
 - h) Date of entry to the programme/ registration to the Producer Group
 - i) Production Yield (past yields since entry date and current year's estimate) validated by the IMS.
 - j) Last date of Internal Assessment

4.5. Member enrolment and removal

- 4.5.1. It is possible that producers may be enrolled in a group programme without their knowledge or consent. SRP requires written consent from each individual producer. Though requirements for new members to join an SRP producer group may vary by group, enrolment should follow the IMS group governance to ensure candidate members are able to fulfil SRP requirements by passing an internal assessment and understand their rights and responsibilities before providing written consent to join the programme. The process for approval of new members is specified in the IMS governance procedure and decided by the internal Approval Manager/Committee.

- 4.5.2. Removal of members can be decided by the members themselves, or as a result of non-conformance determined by an internal assessment and/or third-party assessment. Members also have the right to terminate their own membership in the group, following the specified process. Expulsion of members as a result of an adverse audit (internal or external) should follow the group governance process. Members have the right to appeal any decision, following the producer group's stipulated grievance procedure/mechanism.

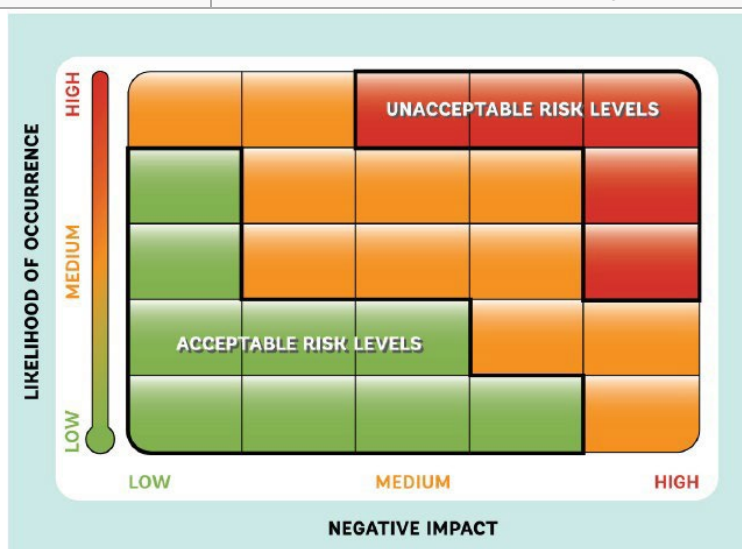
4.6. Internal approval and sanction system

- 4.6.1. Approval and sanction decisions may be taken either by one person or a group of qualified group members (Internal Approval Committee), with the latter as the recommended option.
- 4.6.2. An IMS Internal Approval Committee must be in place to assess individual farmer reports and decide on compliance, and there must be no actual or perceived conflicts of interest among Committee members. Conflict of interest declarations (see [Annex 3](#)) must be signed by all Internal Approval Committee and verified by the IMS Manager.
- 4.6.3. Qualifications for participation in the Internal Approval Committee are as follows:
- No conflicts of interest regarding approval of producer members of the group
 - Good knowledge of the SRP Standard
- 4.6.4. The IMS is required to develop a documented system to implement and record key governance processes, including:
- internal approval and sanction procedures
 - decision-making and corrective measures records
 - up-to-date decision for all assessed producers
 - notifications of decisions to the producer
- 4.6.5. Decisions made by the internal Approval Manager or Committee are intended to ensure that producers are treated fairly and consistently within the group and across group programmes throughout the Standard system. A number of questions should be addressed for this activity, as follows:
- Who will make the decision and what skills and knowledge are required?
 - How can it be ensured that the decision-maker is not influenced in the decision and that they are not in a conflict of interest in regard to the decision?
 - What information is needed for the decision to be made, and how is that information communicated to the decision-maker?
 - When will the decision be made?
 - How will the producer be informed of the decision?

4.7. Risk assessment

- 4.7.1. A risk assessment is conducted to identify potential production risks, considering all compliance criteria defined by the SRP Standard, and to define high, medium and low-risk elements in production.
- 4.7.2. A risk assessment is carried out in accordance with a documented risk assessment procedure and conducted to assess the producers' risk profile; it should be reviewed annually. The results and follow-up actions are documented and available during a verification audit.
- 4.7.3. A 5-step process for IMS risk assessment and management is provided below.

Risk assessment and management process	
Establish the context	Understand the operating context and environment
Identify the risks / hazards	Identify internal and external risks / hazards that pose threats
Analyse the risks	Conduct systemic analysis of various contributing and leading factors (e.g. extent of exposure, multiple exposures to pesticides)
Evaluate and prioritize the risks	Characterize and prioritize the list of risks for further action
Address the risks	Identify the range of potential options to address the risk, and implement the best choice using available resources



- 4.7.4. Based on the outcome of the risk assessment exercise, an annual activity plan according to priorities set for the coming year can be developed. At the same time, it is also advised to consider the "Plan – Do – Act – Reflect" cycle. The annual plan should be related to SMART results (Specific, Measurable, Achievable, Relevant and Time-Bound). A set of data needs to be collected related to the score and threshold compliance against the SRP Standard. These data should be available and stored in the office of the IMS.

4.8. Internal assessment

- 4.8.1. Internal assessment will be carried out for each postulant member prior to enrolment as a member of the producer group; the internal assessment is part of the enrolment procedure. Following member registration, each member's production site or sites should be assessed before joining the producer group and every three years prior to third-party assessment, against all the relevant SRP requirement points under the SRP Standard.
- 4.8.2. In the first year, new group members will undergo internal assessment (100% internal assessment or peer-to-peer reviews, and for third-party assessment at least the square root of the total number of producers. In the second and subsequent years, sample can be based on a risk assessment of group members. In that case, the producer group must take measures to guarantee that all producers receive an internal assessment at least every 3 years. This system generates efficiencies to make the model scalable and cost-effective. A clear mechanism determines the frequency of internal

assessment for existing members based on a clearly defined and documented risk profile and risk assessment.

- 4.8.3. The frequency and sample size must comply with the rules of the respective SRP Assurance Scheme and be based on an agreed assessment plan. [Annex 6](#) provides a template assessment plan to be developed by each internal auditor. The IMS team should collect all internal assessment plans from all internal auditors in order to conduct an annual internal assessment plan; this plan needs to comply with SRP requirements.
- 4.8.4. Individual internal assessment results are documented in the Individual Farmer Reports and in the Group Summary Report. Reports contain (i) producer identification, (ii) previous production and current estimation, (iii) producers' signature, (iv) inspection date, (v) inspector's name, (vi) non-conformities identified, (vii) corrections and corrective actions, (viii) approval or sanction decision. All records of the internal assessment, findings, and follow-up of agreed corrective actions resulting from internal assessment must be maintained and available during the third-party assessment.

4.9. Self-assessment

- 4.9.1. A self-assessment process is required at IMS level in order to assess the main issues to be addressed by producers 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 action plans.
- 4.9.2. Self-assessment uses a different benchmark compared with internal assessment; while internal assessment indicators are based on compliance with the SRP Standard criteria, self-assessment indicators are based on the IMS Standard. Self-assessment is intended to evaluate the performance and effectiveness of the IMS itself. The result may trigger a process of training, coaching, action plans and even modification of the IMS organizational structure. The principle of impartiality must be upheld for self-assessment conducted by IMS staff. Self-assessment results must also be documented and made available to the CAB's auditor prior to third-party assessment.

4.10. Group management plan

- 4.10.1. The IMS must develop group management plan that need to be updated annually. Including all actions taken to address issues identified in the risk assessment, self-assessment report, internal assessment and third-party assessment findings.
- 4.10.2. The group management plan must be developed so that all participating producers can implement. The group management includes as a minimum soil fertilization, integrated pest management, social and gender equality programme.
- 4.10.3. The annual plan should relate to SMART (Specific, Measurable, Achievable, Relevant and Time-Bound) results. There are a set of data needs to be collected to determine the score and threshold compliance against the SRP Standard and should be available in IMS office.

4.11. Soil fertilization program

- 4.11.1. The IMS requires documentation that provides reliable information for the group's fertilization program, preferably based on soil analysis. Advice may be provided by a qualified member of the IMS staff or reference can be made to an expert providing support.
- 4.11.2. Soil analysis must be conducted to check the levels of macronutrients and organic matter as the baseline to develop soil fertilization programme. Based on the soil assessment, IMS identifies soil management measures and includes these in the management plan to build up soil organic matter, increase on-farm nutrient recycling, and optimize soil moisture.

- 4.11.3. Soil analysis starting by checking the presence of organic matter in the "arable" layer(s) of the soil. Also check the presence and diversity of microorganisms (worms, woodlice, centipedes, etc.) and mycorrhizas on roots and bacteria (nitrogen-fixing nodes of Rhizobium on roots), and the depth at which they are found. In details, see [Annex 7](#).

4.12. Integrated pest management

- 4.12.1. As an example of the implementation of the SRP Standard, producers must ensure that chemical inputs used on the farm are not prohibited under Requirement no. 18.1-18.6 of the SRP Standard. The IMS may consider providing a list of permitted chemicals. Producers must follow label application instructions (e.g., dose, frequency of application and use of protective clothing).
- 4.12.2. Food safety procedures must also be in place. Re-entry times and time between last application and harvest must be clearly communicated with the members and strictly observed by all producers.
- 4.12.3. A procedure to handle empty chemical containers is also required (Requirement no. 34 of the SRP Standard).

4.13. Chain of Custody

- 4.13.1. Product traceability and segregation is important to maintain the integrity of rice originating from verified producers. The Chain of Custody (CoC) system requires that all transaction documentation (sales invoices, other sales related and dispatch documentation) must be recorded at IMS level.
- 4.13.2. In the producer/farmer level, the Chain of Custody models that recognized are Identity Preservation (IP) and Product Segregation (Seg).
- 4.13.3. The IMS should identify key risk points and develop a plan to mitigate mixing risk in the supply chain. Documented procedures should be established, including a supply chain flowchart showing product origin, procedure and records for monitoring production volumes, product movement, storage, sale and resale.
- 4.13.4. The IMS must also demonstrate that the SRP-verified rice handled in its facilities are covered by internal procedures to preserve product integrity. It should have a system to identify the verified rice either by visual or physical means; SRP-verified rice must be stored separately from non-SRP rice. Rice in storage must be stored with clear signs to indicate its status and origin.
- 4.13.5. For third-party assessment purposes all records (or copies thereof) must be freely available at IMS level. The IMS must also ensure compliance with the SRP Chain of Custody Policy and Standard (available at www.sustainable-rice.org).

4.14. Handling of complaints

- 4.14.1. A producer group or individual producer with multiple sites must maintain a system to ensure that customer complaints are received, registered, identified, investigated, followed up and reviewed in a fair and timely fashion.

4.15. Service providers

- 4.15.1. The IMS must maintain complete records to demonstrate that the competency of any service providers has been assessed and meets the requirements of the SRP Standard.
- 4.15.2. 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.

4.16. Logo/label use and permitted claims

- 4.16.1. 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, SRP CoC Standard and SRP Brand Manual & Claim Guidelines. (available at www.sustainablerice.org).

4.17. Gender equality and women's empowerment

- 4.18.1. A producer group or individual producer with multiple sites must maintain a system based on the IMS Standard that includes a requirement (R#5) to establish, promote and implement a gender equality policy within the Producer Group.
- 4.18.2. A committee must be appointed, responsible for implementation, monitoring and evaluation of measures to promote gender equality and women's empowerment.
- 4.18.3. Meetings are to be held at least twice per year involving all IMS management staff and group members to review progress on enhancing gender equality and women's empowerment.
- 4.18.4. Note that women's empowerment is also one of the indicators stipulated in the SRP Performance Indicators (PI- 12), on the basis that empowerment of women leads to improved maternal and family health and well-being.
- 4.18.5. In situations where women are directly involved in rice production, women's empowerment (e.g. by increasing women's access to knowledge) is also expected to lead to higher levels of productivity and profitability. This PI can thus be utilized to monitor progress of implementation of the gender equality policy and its impacts.

Annex 1: Training Records - template

Training Records

Subject:

Name of trainer/facilitator/expert:

Date:

Place:

Name participants	Male/Female	Signature

Agenda meeting:

Summary of the meeting and main conclusions:

.....

Signature expert/facilitator/trainer:

Annex 2: IMS Function Descriptions and Staff Qualifications - template

IMS Manager

The IMS Manager's main role is to organize the IMS and advise, motivate and train staff and monitor work in the field. S/he oversees the IMS including overall management and group governance to ensure effective and efficient operation.

The IMS Manager must demonstrate the following competences:

- Detailed knowledge of the SRP Standard, Performance Indicators and Assurance Scheme.
- Good knowledge of the IMS procedures, documents and requirements of the CAB's auditor.
- Ability to run a team and train other people within the IMS team.
- Management of administrative tasks and field data.

Internal Approval Committee

The Committee's main task is to make decisions related to the status of group producers based on group governance and IMS procedures. The committee comprises trainers, internal auditors and the IMS Manager, who must all demonstrate an understanding of the group's operation and governance and familiarity with IMS procedures to guide decisions. The committee must demonstrate impartiality to ensure that its rulings are accepted as fair and consistent.

Trainers

IMS trainers serve to develop and implement an ongoing SRP training program for group members, analyse practices to identify compliance shortfalls and training needs, and implement a regular training program for group members. Training is one of the most important determinants of effective management of a producer group and a key driver of success for the verification process.

Qualifications:

- Mastery of the local language and customs of producers in the group.
- Knowledge of local/regional agricultural systems and farm practices.
- Technical understanding of the SRP Standard and Assurance Scheme, as well as the Performance Indicators.
- Respected by the producers in the group.

Internal auditor

The internal auditor plays a key role within the IMS. His/her role and responsibilities demand technical, administrative and social skills and strong attention to detail. The main task of the Internal Auditor is to conduct internal assessment of all members in the first year of operation of the IMS. In subsequent years internal assessment may take a risk-based approach and focus on members with a higher likelihood of missed thresholds. A minimum of 33% of members must be assessed annually and all members must be assessed internally once every three years. The internal auditor is responsible for developing an internal assessment programme to align with these requirements.

The internal auditor is the 'eyes and ears' of the IMS; the success of the IMS depends to a considerable extent on the commitment and integrity of the internal auditor, as well as the

support and resources made available to enable him/her to accomplish his/her tasks. Priority must therefore be given to continuous training of the Internal Auditor, both at practical and theoretical levels.

Qualifications:

- Mastery of the local language and customs of the producers.
- Knowledge of local/regional agricultural systems and farm practices.
- Understanding of principles and practices of the SRP Standard, Performance Indicators and Assurance Scheme.
- Ability to communicate non-conformities to producers effectively.
- Demonstrable competence in control procedures and internal standards.
- No actual or perceived conflicts of interest that would compromise the integrity of the role.
- Respected by the producers.

Sales Commercialization Unit

A person or group of people responsible for sales of paddy/rice products and for, identification of supply chain risks at producer level in order to contribute to a management plan to mitigate traceability risk, record purchase and sales data and ensure the traceability system is fully implemented.

Qualifications:

- Mastery of the local language and customs of the producers
- Develop selling plan with the group and ability to communicate selling plan (estimated volume) to clients
- A person or group of people possessing an understanding of the principles and practice of traceability and chain of custody.

Annex 3: No Conflict-of-Interest Declaration - template

I (as undersigned) will avoid any conflict of interest and undertake to inform the person responsible for the IMS if the case arises. I will not inspect nor approve any producers that are a member of my family.

I declare that I have family or business relations (parents, brothers, sisters, children, business partners, etc.) in the following villages:

1.
2.
3.
4.

I will not influence the inspection or the decision of approval of any producers that are family members.

I will inform the person responsible for the IMS if any changes occur in my marital or social status.

I fully understand the meaning of conflict of interest and declare that the above information is correct.

Name:

Function within IMS:

Date:

Place:

Signature:

Annex 4: Grievance Mechanism - example



Annex 5: Group Member Registry (GMR)

Producer Name	Contact details	Group ID	Land Status (Owned/Leased)	Farm Location/Address	GPS Coordinates		Production Area	Date of Registration	Production Yield	Last Internal Assessment
					Longitude	Latitude				

Annex 6: Internal Assessment Plan

Internal Inspection Plan

Name of IMS staff member:

Total number of producers:

Number of years participating in sustainability programme year(s)

Inspection time from: / / to / /

No.	Time	Place/area assessed	Number of producers	Auditor	Note

Annex 7: Soil Analysis

Basic factors to be considered in the soil analysis:

- a) Soil structure (and texture).
- b) Soil depth and soil horizons.
- c) Densification of compaction areas.
- d) Identification of erosion-prone areas and slope.
- e) Soil moisture and water level in the soil.
- f) Identification of areas with visual symptoms of nutrient deficiency.

Several different methods for soil assessment have been described and can be used by farmers without the need for expensive equipment. These include:

- a) Willamette Valley – Soil Quality Card;
- b) Shelley McGuinness – Soil Structure Assessment Kit;
- c) FAO – Visual Soil Assessment,
- d) VSA, etc.

A video with instructions on how to test for soil type can be found here:

<https://youtu.be/GWZwbVJCNec>