North Uganda Shea Project Internal Control Manual



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1 Introduction

1.1 The Internal Control System

The Internal Control System (ICS) is a system that guards the integrity of the organic quality of the product. It is a system in which all persons dealing with the product (gatherers, buyers, store keepers) are identified, registered, instructed on the requirements for organic certification and contracted to ensure compliance. The activities of these persons are then monitored in a system of regular visits and documentary control. Besides this, the persons involved are made aware of their common responsibility for the product, which implies a certain social control.

The final responsibility for the implementation of the Internal Control System lies with the project manager (PM) who is undertaking this project, but all staff have their roles. The personnel involved must get training to perform their duties accurately.

1.2 The ICS Manual

This document is a compilation of working instructions and forms used to maintain the Internal Control System of the Northern Uganda Shea Project (NUSP). It describes the responsibilities of each level in the project. It aims to provide for transparency that is clearly documented so that the external inspection can easily understand and evaluate the functioning of the system.

1.3 Availability of the ICS Manual

The complete document should be made available to all concerned co-workers. Each Field Officer (FO) and the leadership of the Rwot Ber i.e. chairperson and vice chairperson, will have a copy of the document. The Project Supervisor (PS) is responsible for ensuring that any updated version of the document is submitted to the FOs.

1.4 Responsibility and Improvement of the ICS Manual

It is the responsibility of the PS to revise this document and the PM to approve it. The ICS Manual is also submitted to the Organic Certification body for approval after each major revision. This document is kept up to date on a regular basis. Findings of the organic project personnel, the results presented in the annual inspection report the annual report, findings of the external inspector, recommendations by consultants and/or conditions by IMO, may lead to adaptations of the procedures and forms presented in this ICS manual. This is to ensure the continued integrity of the organic quality. All users of the document are invited to recommend improvements of the document and the procedures.

2 General description of the project area

Lira district located in northern Uganda is bordered by Oyam and Pader districts to the north, Apac in the West and Kotido and Amuria to the east and Dokolo to the south. In the north-eastern part of the district is the county of Otuke and this is where the NUSP is located due to the high concentration of Shea trees. The trees grow in natural open forests and their nuts have traditionally been collected for home use and local marketing. The table below lists the sub-counties and parishes within which the NUSP is operating. The numbers refer to those shown on Map 1

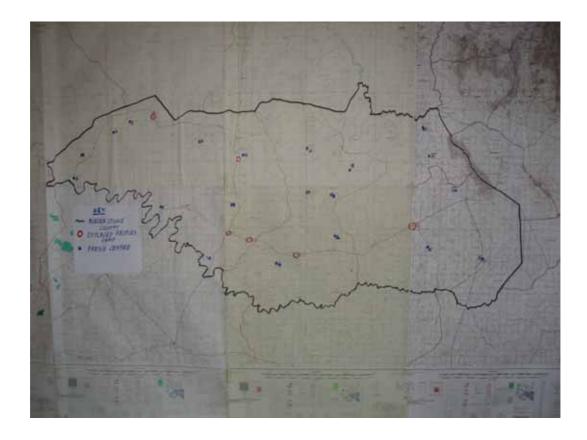
Table 1 - Otuke County Divisions

Sub County	Parishes	Map Number
Okwang-01	Amoyai	1
	Arworngo	2
	Olworongu	3
	Opejal	4
	Barocok	5
Adwari-02	Okee	6
	Omito	7
	Olarokwon	8
	Alango	9
Orum-03	Alangi	10
	Oluru	11
	Ating	12
	Atanggwata	13
	Anepmoroto	14
	(Amnyalima)	15
Olilim-04	Atira	16
	Angeta	17
	Amunga	18
	Anepkide	19
	(Gotolwamg)	20
	Ogwete	21

General

In the last six years, insecurity from the LRA rebels has threatened the existence of normal life and agriculture in the area, with many people having to go to internally displaced persons camps within the district or flee to Lira headquarters, where their security is assured. There are six camps for displaced people within Otuke County at the sub-county level (shown by red circles on Map 1). This has resulted in hardly any cultivation in the villages with many people depending on handouts. However, as the situation improves, people are slowly returning to smaller camps in their parishes and even some to their home areas.

Map 1 – Otuke County



2.1 Agricultural practices

Peasant agriculture is the most prevalent social-economic activity. Usually the men are involved in opening up virgin agricultural land and looking after animals. But with low security due to rebel activities this had been severely restricted and only areas near to the camps are being cultivated. But with improving security, more land in the villages is being cultivated.

Traditionally, it has been the role of the women to gather Shea nuts with the help of their children. The oil from these nuts is used domestically for cooking, preservation and skin care. Some is also sold as a source of income. In the recent past, gatherers had to be escorted by soldiers to the Shea forests but these days movement is relatively free.

2.2 Gatherers' organisation

The gatherers within these target areas are organised into groups based at the village level. These groups come together under the umbrella organisation of Rwot Ber Women's association, which is a partner in the NUSP. The ladies gather and sell their nuts as individuals at a buying centre owned by ALCODE..

2.3 Stakeholders

The National Environmental Management Authority and the National Forestry Authority are the bodies responsible for Natural resources of this nature in Uganda. They implement their controls in a general framework of utilizing resources in manner that ensures income generation for the local people, whilst at the same time working to guarantee their sustainability. The NUSP aims at building good relations with these authorities, especially at sub-county level.

COVOL, an organisation that at one time implemented a USAID funded project to support Shea Oil production and GuruNanak Oil mills are processing Shea Oil in Lira. However, the quantities they buy are small and not targeted at the export market.

3 Description of the Project

3.1 The Operator

ALCODE is a membership based organisation located in Lira district which has been working with women gatherers for a number of years processing their Shea nuts into Shea oil. As a processor ALCODE has good knowledge on the collection, handling, storage and processing of Shea butter.

ALCODE aims at improving the livelihood of the gatherers and their families through the consistent market that it will provide to them for their gathered Shea nuts. ALCODE has requested each of the 22 parish level women associations to nominate one gatherer to act as a FO within the NUSP.

3.2 Project organisation

Through a Tripartite Memorandum of Understanding ALCODE has partnered with Rwot Ber Women's Association and an international export company, KM International/KFP to form the NUSP. Within Otuke county Rwot Ber has registered 1533 women who will be responsible, together with their family members, to collect the Shea nuts and carry out home level processing. The relationship between Rwot Ber and ALCODE has existed over a number of years and the Shea oil which has been produced has been marketed on the local market. The partnership has been able to produce more than can be sold locally and hence the decision look towards the international market and bring KM International into the partnership.

Through the Tripartite M.o.U agreed between the three partners KM International will have the exclusive right to market all organic Shea produced by NUSP. KM International has the responsibility of exporting the Shea butter that will have already been processed and packed by ALCODE.

The 'Processor', 'Exporter' and 'Gatherers' are together referred to as the Shea Tripartite Group (STG).

3.3 The Collection area

The Shea belt stretches from the south—eastern border Uganda where it neighbours Kenya to Uganda's north-western border with Congo and Sudan following an area of seasonally arid plateau. In some places, where population is high, the Shea belt exists as a series of scattered trees amongst cropped fields and in other areas it remains as open forests that harbour many small wild animals and is more in line with its natural character. The NUSP targets areas within the second category, ie natural forests in uncultivated lands. These areas are usually found in the most remote places and within Otuke County this area has been expanded due to the activities of rebels.

Local women move into these grassland forests to collect the nuts from the ground. Traditionally people only collect the nuts once they have fallen from the tree. The Shea tree is a medium sized tree that grows very slowly and it takes between 15 to 30 years before it begins yielding fruit. The tree has been regarded as an extremely valuable resource and has hence been saved from complete removal, even in more populated areas, largely due to its potential to produce Shea oil. However, when there is a high demand for money, even the Shea tree is cut down for timber, charcoal and fuel wood, leaving a sparse Shea population in some areas.



Left:- Cut Shea trees for fuel Right:- Younger Shea trees in grassland

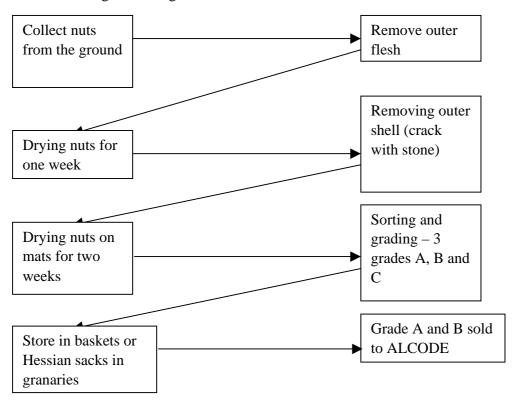


3.4 The products

Local bye-laws make it illegal for any one to climb the trees and so the nuts are collected only when they fall on the ground. The main harvest period is from May to June, with a minor harvest period in December. When taken home the nuts are sorted, dried (see 3.5a) and what remains is sold to ALCODE. The nuts that are not sold to ALCODE either due to poor quality or excess quantity are left for domestic consumption. ALCODE processes the nuts into Shea butter (see 3.5b).

3.5 Gatherer harvesting and processing

Home handling and storage



Grade 'A' is usually reserved for export while grade 'B' is processed for local consumption.

4 Organisation of ICS

4.1 Organisation chart

Position	Name	Main responsibility
Project Manager Project Supervisor (PS)	Onen Julius Kidega Patrick	To supervise the whole ICS To allocate resources and employ staff To make contracts with sub-contractors involved in the organic production To compile data and reports to IMO Cert Ltd To supervise the FOs To manage the files generated in the ICS
Field Officers (FO)	Owek Lilly Omedi Otim Alice Ocaa Lilly Eger Mary Ogwal Mary Ejang Sarah Abang Janet Amolo Molly Okwir Sophia Akello Anna Acam Eunice Ketty Okello Sophia Alira Janet Aguti Hardline Amolo Sarah Amucu Susan Alum Hellen Adongo Mary Abalo Lucy Okwir Jena Apio Janet	To develop and implement the Internal Control System To register and contract Gatherers To maintain records for the Gatherers To perform Internal Inspections To inform Gatherers about organic standards and needed improvements in their system To train Gatherers in organic wild collection
Buying coordinators	Amolo Sarah (Orum) Acam Eunice Kety (Adwari) Abang Janet (Olilim)	To ensure that only organic products are bought as organic. To clean storages and avoid contamination To sign receipts of organic product

	Otim Alice (Okwang) Okello Sophia	
	(Okwongo)	
Processing Manager	Peter Ochan	To clean storages and processing lines and avoid contamination/To ensure that storages and processing lines are cleaned To ensure that the processing follows the standards
Rwot Ber Leaders	Agetta Jane (chairperson)	To oversee gatherers' groups To take part in decision making
	Okori Florence (vice chairperson)	concerning gatherers

More precise responsibilities of the different staff are described in the various procedures in this document.

4.2 Qualification of staff

All staff shall have adequate experience and education for their jobs.

The PS and the FOs shall in general fulfil the following criteria:

- Personal integrity
- Ability and field experience, particularly observation, reporting, social and communicative skills
- Minimal conflict of interest with project members
- Knowledge of wild collection
- Reasonable command in English.

4.3 Training for the Internal Control System

The FOs shall receive training in organic wild harvesting at least once a year. This is done by members of the EPOPA team or other contracted consultants knowledgeable in the field of organic wild harvesting.

Training in implementation of the ICS

The PS has been trained by EPOPA to perform his duties. EPOPA has also performed one initial two days training for the FOs.

Annually the PS shall organise a three-day training for all the FOs in the management of the Internal Control System. Such training shall include at least:

- going through the whole ICS Manual to ensure proper understanding and obtain suggestions for improvement
- practical training of internal inspections
- record keeping and reporting
- handling of violations
- Risk assessment

A new FO will get initial training by the PS. In addition s/he shall follow an experienced FO for one week of fieldwork to get practical experience.

Training in organic wild collection

The main objective of the training is to inform and train project staff on the relevant aspects of organic wild harvesting. New FOs shall get sufficient training in Organic wild harvesting.

4.4 Regulations regarding conflict of interest of staff

The PS may not have any family or business links to any Gatherer. Should that be the case the PM shall be responsible for the handling of that Gatherer.

The FOs may not have any family (parent, brother, sister, wife or partner) or business links to any Gatherer that they inspect. Should that be the case another FO should inspect that Gatherer.

All staff shall sign a declaration of interest form and update it every year (Annex 14).

Resources for the ICS

EPOPA has made available bicycles for all nineteen FOs and a motorbike for the PS to facilitate their movements while carrying out their duties. Stationary such as paper, notebooks and pens are also provided during trainings. ALCODE and Rwot Ber will be expected to maintain this support to field staff to ensure project sustainability, after the initial support given by EPOPA.

Organic standards and other requirements

4.5 Standards used

The organic production of NUSP is following the standards of EU regulation 2092/91 and NOP, as inspected and certified by IMO/Naturland.

Internal Organic Standards

Internal organic standards have been developed by NUSP for the specific local situation of the organic project, but are expected to be applied in regard to all applicable international certification regulations and private standards requirements – see Annex 4. The most important requirements of the Internal Standards are listed in the gatherers contract of which the gatherer keeps a copy. It is the responsibility of the ICS staff to ensure that all Gatherers have the standards and that they understand them.

4.6 Training of Gatherers

Gatherers are trained on sustainability topics and the requirements for organic certification by the FOs, during both the individual interviews with the Gatherers and at the annual Gatherers meetings.

Gatherers' awareness workshops will also be organised and this training will be the responsible for this is the PS.

Sensitising village or regions

Informing Local Authorities about the project is very important, not just to gain their approval and support, but also to avoid other initiatives that may threaten the organic integrity of the ICS. Fields Officers will seek the support of local counsellors in their parishes and have them invited to awareness meetings whenever possible to make the issue of organic wild collection familiar to them.

4.7 Critical points in organic wild collection Sustainability

The main objective of the NUSP is sustainable collection of a naturally growing and thriving resource. The nuts only fall to the ground when they are mature. The gatherers will not at any one time force the nuts down from the trees and only nuts that fall onto the ground will be gathered. However, the gathers are encouraged to leave some seeds on the ground

NUSP also ensures the sustainable regeneration of the Shea trees by adopting standards that discourage bush burning, prohibit tree cutting and promote indigenous tree planting to ensure that the Shea trees, along with other flora and fauna that live within them flourish.

Traceability

A batch numbering system has been adopted to allow traceability, so that any deterioration can be dealt with quickly. Nuts from each parish or village will be kept independently with the codes of the gatherers indicated on each bag. The traceability system is expected to develop as the project begins to deal with larger quantities.

Quality control

It is only legal to gather nuts that have fallen to the ground naturally and hence ensuring maturity is not a problem. However, they can deteriorate on the ground or be attacked by vermin so collection will be done regularly. On collection the outer flesh and hard shell are removed and the nuts are dried on mats or tarpaulins. At this stage the nuts are sorted and graded according to their quality. When satisfactorily dry they are kept in local cribs or Hessian sacks, but are occasionally spread in the sun to avoid any possibility of moulding.

4.8 Risk assessment

Risk	What we can do to prevent	What we can do to check
	it	it
Collection level		
Gathering nuts from	Careful information to the	Interview Gatherer and
areas beyond the	Gatherer	neighbours
confines of the target	Control by other gatherers,	
areas	social control	
Collecting nuts before	Careful information to the	Physical inspection
they fall to the ground	Gatherer	Accepting only mature nuts
	Control by other gatherers,	
	social control	
Gatherer collects nuts	Careful information to the	Interview Gatherer and
that fall due to forest	Gatherer	neighbours
fires	Control by other gatherers,	Physical inspections
	social control	Accepting only mature nuts
An organic Gatherer	Information	Inspection
mixes organic with non-	Penalties if violation occurs	Interview
organic wild produce	Exclusion	Accounts
	Selecting motivated gatherers	
	Careful record-keeping of	
	quantities collected	
Home Storage		
Contamination with	Careful cleaning of storage	Physical inspections
prohibited substances in	rooms/ granaries	
storage rooms/ granaries		
Factory storage		
Contamination with	Careful cleaning of storage	Records
prohibited substances in	rooms	Checking the total supplied
storage rooms	Inspection of cleaning by FO	quantity from Gatherers
	BEFORE taking area into use	Interview with responsible

	Careful record-keeping, and	person
	check that products are OK	
	before taking into storage	
	Labelling stores ORGANIC	
Processing		
Influx of conventional	See storage	
products		
Contamination with	See storage	
chemicals		
Labelling		
wrong labels on finished	Present labels to the Organic	
products	Certification body for	
	approval BEFORE use	
Export		
ACCIDENTAL	Informing shipping company	Interviewing shipping
FUMIGATION BY	AND crew about organic	company about routines
SHIPPING CREW	standards	
Drift over of fumigation	Informing shipping company	Interviewing shipping
gasses from adjacent	AND crew about organic	company about routines
conventional container	standards	

5 Procedures

This chapter gives an overview of all procedures and documentation of the Internal Control System. The different forms are written out in detail in the Annexes..

5.1 The certification cycle

The certification year begins in February and ends in January. Internal inspections will be completed before the end of May each year, so that the gatherers list is updated and completed before the start of the main harvest period in May. The ICS will be updated before the end of the certification year. External inspection is expected to be in June so that the gatherer list can be confirmed and the project areas inspected whilst the Shea trees are in the final stage of their main fruiting period.

5.2 The steps to get Gatherers certified

The following steps are taken in order to get Gatherers certified:

- 1) Selection of collection area and categorising
- 2) Identifying gatherers' groups
- 3) Contracting
- 4) Internal Inspections
- 5) Approval

Selection of collection area

Areas that experience the lowest with possible risk of contamination are the target areas. Within these areas three categories have been identified:-

- a) Shea trees growing in uncultivated areas
- b) Shea trees growing in area cultivated by subsistence farming methods
- c) Shea trees growing with trading centres or near main roads

Nuts gathered from Shea trees situated in a category 3 location will only be collected for home consumption, due to the slightly higher risk of contamination.

Identification of Gatherers' groups

Gatherers are identified through their groups which are usually organised at village level. The gatherers are assigned codes and thereafter their names are included in the collectors list.

Contracts

Once it is clear that the gatherer will supply the project with Shea nuts, the gatherer and NUSP sign the Gatherers contract (annex 2). This contract contains guidelines the gatherer is obliged to follow, as well as commitments from the side of NUSP. The gatherer signs this contract when she has understood the requirements and agrees to follow them. The FO countersigns the contract on behalf of NUSP. The gatherer receives one copy of the contract and the other is maintained in the project office. The contracts once signed will be considered to be life contracts or until the gatherer

contracts out, or the project terminates the contract. The contract can be seen as a certificate of the Gatherer.

Internal inspections

Gatherers are inspected by the FO at least once a year. A selection of collection areas, within the different categories is monitored, and all storage places are visited. A checklist closely related to the Internal Organic Standards is used (Annex 5). This checklist helps the FO to check the progress of the gatherer and establish whether she is still complying to the internal standards of the project and the Wild Collection Standards in general. Interviews and observation will help the Inspector make the necessary comments along with individual instructions. The Inspector may accompany the gatherer during collection to get first hand information.

Inspections encourage serious one to one interaction with each individual Gatherer and vice versa. The checklist should be signed by the Gatherer to indicate that she has understood what is noted and that she agrees with the results and with the instructions for improvement. Advice given at earlier inspections should be followed up.

If violations are discovered it shall be reported immediately to the PS.

It is recommended that the Internal Inspector intensifies his/her field visits during the harvesting period.

Approval

The PS is responsible for the approval of Gatherers and other units in the project.

5.3 Coding system

In order to have a transparent and unique identification of all actors in the system they are assigned a unique code. The Codes shall be used on all documents as well as on labels as appropriate. (Annex 12)

5.4 Buying procedures and documentation

At the moment of buying, a clear audit trail of documents is started to ensure that it is possible to trace the export product produced in the different parishes to the processing unit or store in the importing country, and the other way around. To keep a proper traceability also allows the project to exclude products even in the cases where they have been delivered but not yet processed, and can be used for quality improvements, e.g. if at processing it is identified that products from a certain buying station is sub standard in some way the staff can be instructed to improve.

Buying of the products from the organic gatherers follows a strict procedure as described below. The Purchasing Record (annex 8) records the purchases that are made from the gatherers and follows the same format as the Gatherer's list. The form allows NUSP to monitor the deliveries of the gatherers against what they are

expected to deliver. The treasurer of the buying station fills in the form and the original is kept at the buying station, to which the Project supervisor and the Internal Inspector have at all time access.

- 1) The buying is done at sub-county level and physical demarcations will be made in the buildings to separate the parishes
- 2) Before starting buying, the persons responsible for buying must have a copy of the PR, with indication of each certified Gatherer.
- 3) The Gatherer is identified as being an organic Gatherer by presenting her contract.
- 4) At the moment, each gatherer is allowed to sell only 240kg (2 sacks) of good grade nuts to the project. If there is any doubt about the produce, the produce is kept apart until the FO or PS has checked with the respective Gatherer and has indicated whether or not to allow the produce in the organic line of trade.
- 5) The quantity of organic product delivered is recorded in the Purchase Record.
- 6) A Cash Voucher is completed. The Voucher should contain both the weight and the value. The vouchers will be stamped organic. The Gatherer receives a copy of the Cash Voucher. Other copies will be kept in file by the PS.

The records of purchase are kept in the project offices.

5.5 Storage and handling procedures

At no time during the buying, further processing or handling of the Organic Shea, must there be any possibility that conventional products infiltrate the product. Once bought the organic product will be clearly labelled and identified

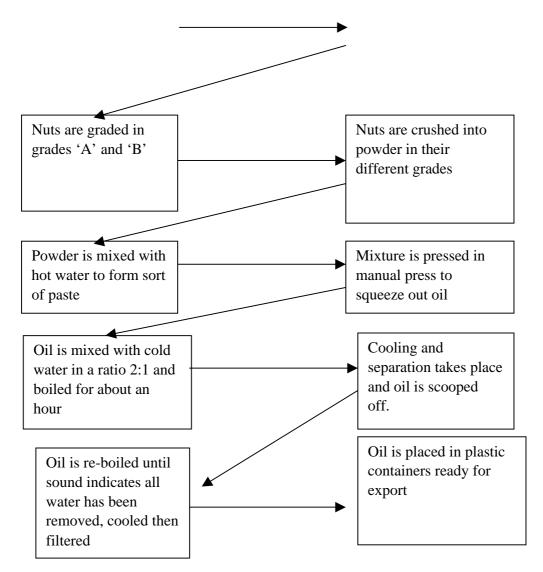
The following procedures apply:

- 1) All stores must be registered in the Facility Registration Form (annex 10).
- 2) Signs must be placed on the inside (walls) and outside (doors and forefront) of the building indicating that it is an organic store and the type of organic crop it contains.
- 3) All stores or processing places must be cleaned out before organic products are stored. This is registered in the Facility Declaration Form (annex 11).
- 4) The organic product must be kept in bags labelled ORGANIC. To avoid mistakes, organic bags shall never be used for the packing of conventional product or any other product.
- 5) The bags are labelled (see section on labelling)

5.6 Processing Procedures

Nuts arrive at processing plant and spread on tarpaulin

Nuts are cleaned with cotton cloths in saucepans or on tarpaulin



5.7 Packaging, marking of sacks/drums

The Gatherers deliver their Shea nuts to the Buying centres in their bags or containers. The produce will be repacked at the buying centre with bags marked "ORGANIC" and with a label with the store Code and date plus an indication 'certified organic by IMO SCES004'. It will then be transported to the ALCODE store and processing unit in Lira. When the Shea oil is processed it is packed in drums. Each drum will have a batch number and it will be known which gatherers contributed nuts to which drum. The Organic Certification body Logo will also be attached.

5.8 Procedures in case deviations are found

If the FO notes a violation of the standards or other conditions for the project, she shall immediately fill in a Violation Report (annex 7) and submit to the PS. The PS will take any of the following actions depending on the nature of the violation:

- issue a warning to the Gatherer and the produce will be bought for hot press (local consumption only)
- not buy from the gatherer for the whole season
- exclude (de-certify) the Gatherers completely from the project.

When assessing violations, the PS will consider if the violation was caused by ignorance or by intentional fraud.

All violations are recorded on the Violation Report, where also the decision is noted down. Violation Reports shall also be used for any violations detected at the stores or Buying Stations. The Gatherer shall be informed of the outcome of the decision. This shall be done by the PS.

Procedures for Gatherers that are decertified

The Gatherer is informed that she has violated and the contract is withdrawn from her. The cancelled contract is entered in the file together with the Violation Report. The Gatherers list is updated by hand and clearly marked that the Gatherer has violated. If the Purchase Records are present then the Gatherer is crossed off the Purchase records. If this occurs before the end of the season, the computer records are up dated. A note is made on the Gatherer's name indicating type and date of violation. In the following year the Gatherer may be removed from the gatherers lists.

Appeals

If a Gatherer doesn't accept the decision on violation, she can make an appeal to the PM. The PM shall carefully interview the Gatherer, the FO and the PS before making a decision. Any result of an appeal should be noted on the Violation Report.

Decision about violations by IMO Cert Ltd

In some cases IMO Cert Ltd may have another opinion than the NUSP about the proper sanction for a certain violation. NUSP will apply any sanction as instructed by the IMO Cert Ltd.

5.9 Assisting the IMO Cert Ltd

When IMO Cert Ltd sends the inspectors for the external inspections, the PS must be in place and all FO shall be available. They shall check in with the PS in the start of the inspection to get any instructions.

6 Documentation

The following document and forms are used in the Internal Control System

Form	Abbreviation	Annex #	Explanation
Gatherers list	GL	1	Summarises data about gatherers
Gatherers contract	GC	2	To be signed with every
			individual gatherer
Internal Organic	IOS	3	Developed to act as a clear and
Standards			precise organic control for the
			NUSP
Checklist for internal		6	Checks whether gatherer still
inspections			complies with organic standards
Violation Report	VR	7	Is used to report Violations
Purchase Records	PuR	8	Summarises all the buying per
			day, and per Gatherer. Give a
			total of all Products bought
Processing Records	PR	9	Details processing
Facility Registration	FRF	10	Registers stores and other
Form			facilities used in the organic
			project
Facility Declaration	FDF	11	Is used for stores and processing
Form			units to verify their cleaning
Payment vouchers	PV		Are issued for each delivery by
			Gatherer. One copy to Gatherer,
			one kept in the buying station
Interest Declaration	ID	13	Indicates possible areas of
			conflict of interests amongst
			project staff
List of current codes		12	Lists all codes used in the project

6.1 Documentation Flow

The contract, checklist for inspections are filled in by hand and kept in hand written form. The PS shall go through them, sign them and submit them to be entered into the computer. The gatherers lists will be stored on computer and the forms for the gatherers lists, Purchase records and project summary will be generated by the computer. The Gatherers lists are updated prior to every harvesting season and sent to the IMO Cert Ltd. Each field staff receives a copy of the gatherers lists for their parish, and Purchase records, prior to the start of the season.

7 Organic office

ALCODE will furnish an office at their headquarters for the organic project administration. In this office the project administration is based, including accounting and data base management. At the Organic office the following files are kept which relate to the ICS:

- Original Gatherers' list,
- Any sub-contractor's agreement
- Interest Declarations
- Contract for project staff
- Originals of the Gatherers' contracts,
- Originals of the Violation Report
- Copies of the Cash vouchers,
- Copies of the Purchase Records,
- Books of accounts of the organic project,

Old files are stored at the Organic office with a clear indication of the year. All files will be kept for at least a period of 5 years as required by IMO Cert Ltd

Most of the forms are designed as a spreadsheet in Excel in a way that it allows to be filled out by hand. Where possible the files are copied on the same form in the computer. This will reduce the amounts of miscalculations, and the digital forms can be easily sent over e-mail to the Organic Certification body.

8 Certification Reports and Internal Review

The certification year runs from February to January. The following reports are generated in the project

Document	When
Gatherers List completed	Prior to Buying (May)
ICS Manual update	After Annual Revision
	(February)

8.1 Review by the Project Supervisor and Project Manager

Annually the Project Supervisor and the Project Manager should review the ICS system and in particular the performance of the staff. They should go through a sufficient sample of the documents, analyse how they are used, identify possibilities for improvement etc. The results of this review will normally lead to a revision of the ICS.

Annex 1 Gatherers list

Code	Name	Training Date	No. of family members	Remarks
Example				
OK-OB-001	Neko Agea	E.g. 10 th March 05	E.g. 6	E.g. Group secretary

Annex 2 Gatherers contract (English)

CONTRACT
Between
(gatherer)
and
Northern Uganda Shea Project (NUSP)
Northern Uganda Shea Project (NUSP)
 Co-ordinates the entire organic project. Co-ordinates the organic inspection. Buys the organic shea nuts for a sustainable and transparent price including a possible organic premium (depending on market) when the shea nuts are of suitable quality. Provides the gatherers with new, clean bags for collection and transport before the collection season starts.
5. I promise to follow the Internal Collection Rules set by the Northern Uganda Shea Project(NUSP).6. I will only collect in the defined collection area/s
 of
Place: Date
Gatherers name Signature
Northern Uganda Shea Project:Signature

Annex 3 Gatherers' contract (Langi)

CIKEREAME TYE IYI AKIMA
(Odep Yao) Kede Northern Uganda Shea Project (NUSP)
Northern Uganda Shea Project (NUSP):
 En ame akubu tic ame tye ite purujek man me Yao ame pe Okiro (Organic). En ame tiko yika kede tic me roto kite ame cikere tye alubere kede dok dang neno bale ame tye akato kede yiko. En ame bino wilo nyig Yao ibot memba iwel ame beber man bino lubere kede welame okato kede moo ni icuk. Dang bino poki odep Yao cao acil aber me gwoko nyig Yao kede me tero kan ame obio iye. Man ducu bino tnige ame pe okapo depo Yao.
Moko Tam (Cikere):
 A cikere me lubu iyore iyore gin duc ame myero atima ipurujek man me Northern Uganda Shea Project (NUSP). Abino depo kara Yao ame tye ieria me purujek man omoko keken ame man tye:-
Alubere kede cal onyo yoo me wil ipaco moro no. 3. Abino depo alubere kede kite ame purujek omoko ni adep kede keken. 4. Pe abino depo en atye inget yoo en acegi kede ikan oonyo yugi, kan kede kan ame jo bedo iye. 5. Pe abino ribo Yao ame adepo kede kit ginoro keken ame opuro onyo ame okiro kede. 6. Abino tito oko bot Northern Uganda Shea Project (NUSP) tek, aneno ginoro keken ame pe rwate kede miti apurujek tye atimere ieria ame purujek (apor). Kiro cem leyi kede kemikal. 7. Tek ame aneno ginoro ame turo cikere ame tye ite purujek man, abino miyo ngecere oko cutucutu bot otela me purujek man. 8. An dong atyeko niang aber ni turu cikere ame oryeo kani bino kelo pwodogo acalo:- kwero wilo Yao ni kede ryemi dong atwali me bedo amemba ite iryonget man. 9. Abino yeyi dano ame NUSP omio twer me keburo idiro kan ame adepo iye Yao, kan agwoko
Yao iye kede naka kan ame dong obio iye moo Yao. Kabedo:
Njing adep Yao Cinge
Northern Uganda Shea Project: Signature

Annex 4 Internal organic standards (English)

Key Organic and Quality Issues (Agreed in a Participatory fashion in June 05)

- 1. Shea Nuts will only be collected from designated areas and only by family members of the registered collector
- 2. Shea Nuts will not be collected from within main trading centres.
- 3. No picking of Shea Nuts from the trees only ground collection is allowed.
- 4. A proportion (about 2%) of the Shea Nuts should be left on the ground after collection to ensure sustainability.
- 5. No chemical use is allowed in fields where trees are found or in homes where Shea Nuts are processed and stored.
- 6. Shea nuts must not be dried on the bare ground tarpaulins or mats should be used.
- 7. Storage should be in a proper way that avoids spoiling of nut quality key points are; removal of bad Shea Nuts, Natural storage containers eg hemp sacks or traditional granaries and regular removal from store to allow air circulation and further drying.
- 8. Grading through the collection, processing and storage procedures will be carried out to maximise the production of Grade "A" and "B" Shea Nuts.
- 9. Some nuts, especially grade "C", should be preserved for home use

I understand and agree to keep these internal standards:-

Signature:-	Date:
Name:	Project Code:

Annex 5 Internal Organic Standards (Langi)

Tyen Kope mogo apirgi Tego (Ame lwak omoko I pwonyere man)

- 1. Nyig Yao obino depo ka ikabedo ame oyero ni dep Yao iye keken dang dok dano ame ocoye ite project man kede jo me pacu mere keken obino wilo Yaogi
- 2. Nyig Yao ame tye kan alwak (jo) bedo iye pe obino wilo ite purujek man.
- 3. Pe myero iyeng Yao ayenga ento myero idep Yao adepa ame oony piny.
- 4. Ikare me depo nyig Yao myero iwek nyig Yao dong piny ilum arom pacen aryo (2%) ikom yao lung ame idepo pi miyo tyen Yao atino (enyen) tuu.
- 5. Ginoro ame okiro kede kemikal pe myero bed tye ibung ame odepo Yao iye kede kan ame ogwoko nyig Yao iye.
- 6. Pe myero imo nyig Yao ni ikom lobo ento myero iti kede okeke, kapet ikare me moyo Yao.
- 7. Kan igwoko njig Yao iye myero bed aber ame pe balo Yao. Myero dang iyer nyig Yao ame opuru kede en obare oko kom Yao atye istore ni. Pe iti kede puku cavera me gwoko Yao ni ento tii kede:-
 - Dero
 - > Dwongo kede gin ame mio yamo kutu nyig Yao.

Anyang dang aye me gwoko cik ame mite irwon amalo:-

- 8. Yao ame oyero acil ame baloro pe iye en ame obino wilo me biyo moo grade "A and B"
- 9. Myero dang igwok nyig Yao mogo me acama me paco turi (polere Yao me grade "C").

Aketo cingo:-	nino dwe:	••
nyinga:	Nying iryonget:	

Annex 6 Checklist for internal inspections

Gatl	nerer Code	Gath	erer Na	ıme
Vill	age]	Date
		Yes	No	Comment
	Nuts collected only in designated areas			
	Nuts were not collected from trading centers			
	No chemicals were found near the collection area			
	Nuts collected only from the ground			
	No chemicals were found in the stores/ granaries			
	Nuts are dried on mats or tarpaulin			
	There is good hygiene in the storage places			
	The nuts are properly sorted and graded			
	Grade 'A' nuts are reserved for the project			
		1	1	
Date	e Signa	ture of l	FO	Gatherer's signature

Violation report Annex 7 The following violation/deviation of standards has been noted: The information about the violation was Revealed by the gatherer Observed by the FO (Tick the appropriate) What reasons does the gatherer give for the violation? Recommend the following measures to be taken: Place and date: Gatherer's signature: FOs signature: I have received this Violation Report: My decision regarding the violation is: 1. The Gatherer shall be given a warning and the produce will be bought for hot press (local consumption only) The project will not buy from the gatherer for that whole season 3. The Farmer will be deleted (de-certified) from the project immediately Reason:

FS's signature

Grolink - AgroEco ALCODE ICS 2007/2008

Place and date:

Annex 8 Purchase Records

Northern Uganda Shea Project

1	N.T	г	0 (0 1	0 1	0 1	0.4	0 (0 (0 (_ ·	<u> </u>	0 1	0 1	^ '
code	Name	Estimate	Qnty	Qnty	Qnty	Qnt									

Name/ Signature of the responsible person:

Annex 9 Processing Records

Northern Uganda Shea Project

Date	Lot number	Quantity of nuts	Quantity of oil	Quantity of waste	Processing ratio	Packing (kg)
	1101110 01	11000	011	,, asc	TWITS	(8)

^{*}Must correspond with the buying centre code –date of processing

Name/Signature of person responsible:

Annex 10 Facility Registration Form

Facility Type:	Date:/
Facility Name:	Code:
Name of Facility Owner:	
L	
Size of Building	
Height (meters)	
Width (meters)	
Length (meters)	
Volume	
Materials Used on Building	
Roof	
Walls	
Floor	
History of Building	
1 year ago:	
2 years ago	
Name of Person Responsible:	
Information Collected by:	Date
Information Verified by:	Date:

Annex 11 Facility Declaration form

North Uganda Shea Project Facility Name: 1. Code: _____ For Period From: / / to / / 2. Facility Use: To be completed by Responsible Person 3. I declare that this facility and any equipment in it for use with the organic Shea butter has been thoroughly cleaned by (describe method of cleaning). Name: Date: **Signature** 4. To be completed by supervisor/field officer I have on this day inspected the cleaned facilities and equipment to ensure that they have been thoroughly cleaned and that there are no inorganic substances or items that could have possibly contaminated the facility or any of the equipment her in. Name: Date: **Signature Information Verified by:** Date:

Annex 12 List of current codes

Gatherer, purchase centre and store coding system

Each Gatherer shall be assigned with a unique code number.

The Code number is in the format:

YY-XX-###

where YY represents the Parish, XX represent the village and ### represents a serial number for Gatherers in that village, e.g. OR-ATG-01

The assigned Code shall be permanently maintained and follows the gatherer

Buying Centres

The Buying Posts are given a Code as follows

Sub county	Code
store	
Okwang	OK01
Okwongo	OW01
Adwari	AD01
Orum	OR01
Olilim	OL01

Stores

Note: the stores in the Buying Centres are included in the code of the Buying Centre.

Annex 13 Interest declaration form

Signed:

Code Number	Gatherer Name	Parish	Type of Relative or
			business relationship

Date