



# RWS Group Certification Manual version 1.0



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**Disclaimer**

The goal of this document is to support the establishment of farm groups under the Group Certification Protocol of the Responsible Wool Standard. This document is a supplementary guidance tool and should be read in conjunction with the Responsible Wool Standard and the RWS Implementation Manual.

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## Introduction

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This guidance document has been developed to help you design and implement an Internal Control System for Group Certification for the Responsible Wool Standard. An Internal Control System (ICS) is a system to ensure that a group is meeting the requirements of the standard.

Section A of the document contains an introduction to Group Certification and Internal Control Systems and what they can help you achieve. Section B contains guidance to help you create an ICS system. Template forms and records to assist with meeting the documentation and record keeping requirements of the standard are provided in the appendices. Section C provides guidance on the certification process.

## A. General Guidance

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### General Information

RWS Group Certification is a system that allows a group of farmers to work together towards meeting the requirements of the Responsible Wool Standard as well as sharing the cost of certification among the group members. In addition to the reduced cost of certification for farmers, group certification can also bring additional benefits such as peer to peer support and sharing of best practices.

### Farm Group

A group of farmers that has similar farming practices, is located within the same geographical region, and is managed by an ICS. Farm Groups can be cooperatives, associations, or similar organizations. The Farm Group can be self-organized and run by members, or organized by a separate entity such as a trader or broker.

### Key principles

As you begin to develop an ICS, keep the following basic principles in mind:

- An ICS can be designed to fit the Farm Group's needs, building on existing systems or developed from scratch. There is not set structure that must be followed. As long as the principles set out in the standard are met, the design of the group is up to your group to determine. Your ICS must make sense to the members of your organization.
- Group certification means that all members of the Farm Group must meet the requirements of the standard in order for the group as a whole to be certified. Therefore, it is important that all Farm Group members have a clear understanding of the standard and the implications for the group as a whole of not meeting the requirements.



## B. Developing and Implementing an ICS

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### 1. Getting started

There are a variety of tasks involved in making your ICS happen. The order in which you do many of the tasks is, however, flexible. Many of the tasks will have to be done at the same time as each other.

The development of an ICS can be divided into two stages: the initial planning phase and the implementation phase.

Initial Planning phase: Before starting the developing, decide who will carry out the developing of the ICS, what they will do and how they will do it.

Implementation phase: This includes the day-to-day activities of the ICS, periodic evaluation and making any changes needed to ensure the effective running of the system.

### 2. ICS Development Overview

The steps involved in developing an ICS for the RWS are outlined below. The order of steps is approximate. Part II of this guide will go into further detail of the different tasks and elements involved in the development of an ICS.

In addition to the steps outlined below, it is recommended that contact is made with an external Certification Body at an early stage as they will be able to offer guidance and support in advance of the application for certification. Application for certification can be made once the ICS is fully operational (see "C. Becoming Certified").

### 3. Initial planning

The very first step is to assign a person or establish a core group of people to begin planning the ICS. The level of resources required will depend on the size, complexity and structure of the group. The responsible person/core group should use this guide and the RWS to help inform the development. Textile Exchange can also provide advice and support in planning.

### 4. Design the ICS Structure

There are different ways of designing the structure of the ICS and how it will operate. One size does not fit all so decide on an approach that suits the circumstances of your Farm Group.

Centralized: A core ICS person or team carries out all of the ICS activities for the entire Farm Group.



Community based: ICS activities are carried out by farm group members, one example of this would be that the internal inspections are carried out by farm members (peer inspections). Results are aggregated to allow for inspection by the certification body.

A combined approach where a centralized ICS delegates some specific tasks - to individuals reporting directly to the centralized ICS - is also commonly used. Depending on the size and structure of the Farm Group, the control of the ICS can also be divided into different levels with groups of members working as sub groups and the main ICS aggregating the results.

## 5. Assign Roles and Responsibilities

The number of people required to run an ICS varies, but as a general rule, the more complicated the ICS and the larger the Farm Group, the more resources will be needed to run the ICS. Having written job descriptions helps to clarify who is responsible for the different aspects of implementing the RWS ICS. The suggested roles needed for a RWS ICS are outlined below.

### 5.1 ICS Manager

The ICS Manager is responsible for organizing the ICS, training the staff and participating farmers, and supervising the implementation of the RWS in the group.

The manager should have:

- A detailed understanding of the RWS
- Good knowledge of the ICS procedures, documentation, and requirements of the Certification Body

### 5.2 Internal inspector

The Internal Inspector is responsible for carrying out the internal inspections of the Farm Group members in order to ensure that they are complying with the requirements of the standard. The Internal Inspector needs to have a detailed understanding of the RWS requirements. This role could be performed by the ICS Manager. Internal inspections could also be conducted through a peer-to-peer approach, where member farmers do the inspections on each other. Self-inspections are a good way for farmers to ensure that they are meeting the requirements of the standard but are not sufficient for the ICS.

## 6. Farm Group Membership

Group certification means that all members of the Farm Group must meet the requirements of the standard in order for the group as a whole to be certified.

The RWS requires that each member of a Farm Group signs an agreement that commits the member to follow the standard, report non-conformities, and allow



inspectors and auditors to inspect their farm. There is a sample Member Agreement template provided in the Appendix.

Having clear procedures for agreements between the group and its members will ensure that group members 1) agree to be members, and 2) understand what is required of them as members.

When a new member applies to join the Farm Group, an internal inspection must be carried out before the new member is added to the Farm Group.

During the audit of the ICS, the Certification Body will review the signed membership agreements.

## 7. RWS Farm Questions

In addition to the Member Agreement for all Farm Group members the ICS also needs to hold a copy of the RWS Farm Questions for each member. The Certification Body will also collect the responses to the RWS Farm Questions for each group member. The Farm Questions will help members prepare for the audit and help the CB determine the selection of Farm Group members to audit. The Certification Body will submit the completed forms to Textile Exchange. This information will be used for measuring and evaluating the impact of the standard. The identity of farms or individuals will be kept confidential. All data will be aggregated to further protect the identities of the farms or individuals involved. The Farm Questions are available in an excel form on [www.responsiblewool.org](http://www.responsiblewool.org) or from the Certification Body.

## 8. Internal inspection process

The goal of internal inspection is to ensure that all Group Members are following the requirements of the Standard. This internal inspection is crucial to a strong ICS because it reduces the level of risk across all farms, and results in fewer individual audits to be conducted by the Certification Body. Internal inspections should include: 1) inspection of the ICS and 2) inspection of Farm Group Members.

### 8.1 ICS Inspection

Although it is not mandatory, it is a good idea to carry out a review of the ICS itself in preparation for the audit to make sure that the ICS is set up to meet the requirements of the RWS and operating effectively.

### 8.2 Internal Inspection of Group Members

Internal inspections are a mandatory requirement of Farm Group certification.

The internal inspections prepare the Farm Group members for the external audit by the certification body. The RWS requires that internal inspections of all group members shall be carried out at least annually. In cases where there is a higher



degree of risk, the frequency of inspections should be increased. Inspections should take place at different times of the year in order to align with different activities such as marking or shearing.

Internal inspections can be carried out internally by the producers themselves (peer inspections), by employees of the Farm Group organization or outsourced to external parties. In all cases, it is necessary that training for internal inspectors is provided and that there is monitoring in place to ensure that internal auditing is consistent.

The internal inspection shall cover all the requirements of the RWS and involve:

- Farm audit (visual inspection)
- Document and record check
- Interviews with farmer and workers

### 8.3 Inspection Report and records

Following the internal inspection, an inspection report should be prepared detailing any areas of non-conformity with the standard and corrective action needed.

The RWS requires records of internal inspections to be kept. The internal inspection report shall contain the following information:

- Name of the farmer and the inspector
- Details of the farm (location, size, etc.)
- Date of the inspection
- Result of the inspection, including details of any non-conformities and the necessary corrective measures.

See Annex for a sample report.

## 9. Dealing with Non-Compliance

### 9.1 Disciplinary system

The ICS must have a disciplinary system to correct activities that do not meet the requirements of the RWS. When a member of the Farm Group or another aspect of the Group Certification is not meeting the requirements of the standard it is the role of the ICS to identify the problem and follow up to ensure that corrective action has been taken.

All instances of non-compliance with the standards should be documented, including the date, persons involved, and a description of the non-compliance.

A plan to correct the problem should be agreed between the persons needing to make the corrections and the ICS. A timeline should be included for making the correction(s). This agreement should also be documented.





## 9.2 Requirement types

The requirement types and times for addressing non-compliances set out in the Responsible Wool Standard Section A.8 (see below) apply for Farm Group internal audits.

### A8.1 Animal Welfare Requirements

Each Animal Welfare Requirement has been assigned an NC level. If one of the requirements is not met at the initial On-Site Audit, the NC level determines the effect on the certification status.

NC-1: NC-1 level requirements relate to critical practices (e.g. mulesing, castration, tail docking, and on-farm slaughter). Any NCs related to critical practices are not allowed. Critical practice requirements shall be met before or at the time of the first audit.

NC-2: NC-2 level requirements relate to general treatment of the animals. NC-2 violations shall be corrected within 30 days of the farmer receiving the audit report.

NC-3: NC-3 level requirements relate to documentation or infrastructure. NC-3 violations shall be corrected within 90 days of the farmer receiving the audit report.

### A8.2 Land Management Requirements

Each Land Management Requirement has been assigned as either MAJOR or MINOR. This classification is used to distinguish required criteria and criteria that may be met through continuous improvement. Some requirements may not apply to certain farming situations, in those cases, scoring shall be adjusted accordingly by the Certification Body.

MAJORS: All of these requirements shall be met to achieve certification.

MINORS: In the first year of certification 50% of the applicable Minor requirements shall be met. For subsequent years, this score shall increase by an additional 10% until 90% or above is achieved.

See Annex for sample forms.

## 9.3 Sanctions and appeals

Where a Farm Group member is found to be in non-compliance with the standard and fails to implement the necessary corrective action in time, sanctions shall be put in place and wool from the Farm Group member may not be sold as RWS certified.

The Farm Group shall keep records of violations and sanctions as part of the ICS records, along with records of removal of members of the Farm Group. In the case of removals of farm group members, the Certification Body shall be informed immediately.



## 9.4 Derogations

It is possible that a situation will arise in which a farmer meets the goals of the standard, but does not conform to a specific requirement of the standard. In this situation, the Certification Body may request to grant a “derogation” which means the certificate is issued without the requirement being met. Derogations are granted on a case-by-case basis, and only for a limited period of time per farm.

In these cases, the Certification Body will submit the audit report to Textile Exchange, along with the description of the derogation, the reason for the derogation, and the amount of time allowed for the derogation. Textile Exchange will make the final decision of whether or not the derogation is allowed.

## 9.5 Right to appeal

Farm Group members found to be in non-conformance with the standard shall have the right to appeal the findings. The ICS shall have an appeals procedure in place and group members shall be aware of their right to appeal.



## C. Becoming Certified

### 1. Application

Application for certification can be made once the ICS is fully operational.

Farm Groups shall apply with an approved Certification Body. As part of the application for RWS Farm Group Certification, the ICS manager shall be required to show proof of an established and fully operational ICS prior to the first audit. A list of accredited Certification Bodies is available on [www.responsiblewool.org](http://www.responsiblewool.org).

### 2. External Audit

Third party verification of Farm Groups is carried out by Certification Bodies. Like the internal inspection, the audit is also carried out on two levels, with an audit of the ICS along with a sample of the group members. The purpose of the audit is to determine if the ICS is functioning effectively and can accurately detect and deal with non-compliance among the group members.

#### 2.1 ICS Audit

The audit of the ICS will verify the following components

- Proper internal procedures are in place
- Accurate records are kept for all identified group members
- Internal inspections of all group members are carried out at least annually
- Adequate records of internal inspections are maintained through the ICS
- Instances of non-compliance are dealt with by the group management
- Internal inspections are conducted by competent and trained inspectors

#### 2.2 Farm Audit

In addition to the audit of the ICS, the Certification Body shall also carry out annual on-site audits of a selection of Farm Group members.

The minimum number of Farm Group members that will be inspected during the audit is the square root (rounded up) of the total number of group members. This number may be increased at the discretion of Certification Body, based on risk factors (e.g.: variations in farming practices, large geographic area). The inspection of Farm Group members will cover compliance with the requirements of the RWS as well as a verification of the internal audit findings recorded by the ICS.



### 2.3 Re-evaluation

Over time, you will learn if there are aspects of the system that could be improved to make the system more efficient. A good ICS takes time each year to evaluate its own performance and progress, and decide how improvements can be made.

## 3. Chain of Custody

### 3.1 Scope Certificates and Transaction Certificates

Once certified, the Farm Group is considered as a single certified Organization and will receive a single Scope Certificate.

A Scope Certificate is a document issued by the Certification Body that verifies that a given organization is qualified to produce goods to the standard.

RWS Farm Scope Certificates are valid for 3 years, with one On-Site Audit per calendar year. The Farm Scope Certificate apply to all the wool produced during the calendar year of the first audit as long as the following requirements are met:

1. At the time of the audit no Animal Welfare NC-1s are found.
2. The Farm Group has never mulesed or all members have achieved Ceased Mulesing status prior to the calendar year of the audit.
3. Chain of Custody of the previously shorn wool is confirmed.

Wool from member farms during the validity period of the scope certificate for the Farm Group is considered to be RWS certified wool. When RWS Wool is sold, the Farm Group shall apply for a Transaction Certificate from the responsible Certification Body.

A Transaction Certificate is a document supplied by the Certification Body that verifies that the goods being shipped from one organization to the next conform to the Responsible Wool Standard.

Individual farms in the group may not use the certification independently (i.e. they cannot individually sell wool as RWS certified). The ICS Manager may not necessarily own the goods, but a TC may still be issued – with the Farm Group named as the seller – on behalf of the group. See TE Policy and Template for Issuing Transaction Certificates (TCs).

### 3.2 Identity preservation

In order for wool produced by Farm Group members to be sold as RWS certified, systems shall be in place to ensure that the identity of the wool is preserved. Parallel production is prohibited at the farm level, and safeguards should be in place to ensure that non-RWS certified wool is not brought into the system. This can be done through labelling, numbering or identification of the physical location where the wool is stored and handled.



## Appendix – ICS Records and Documentation

It is important to create a strong system for documentation of the operation of the ICS as this is what the Certification Body will inspect during the audit to see that the system is working. Written records play an important role as they are sometimes the only way to verify certain aspects of the RWS. Records are also essential for auditors to be able to compare what has been recorded to what is observed on the farm.

This section includes a selection of forms, templates, and other documents you can use in your ICS. You can also choose to create your own documents. It is worth spending time on developing documents and systems that work for your Farm Group initially to make sure that your ICS is set up to work in conjunction with existing systems and processes that may already be in place. You can also be flexible in the format and content of document as long as the requirements of the standard are met.

There are also a range of forms and templates available to support the implementation of the standard. These can be found on [www.responsiblewool.org](http://www.responsiblewool.org).

1. Member Agreement
2. Member List (separate excel file)
3. Internal Inspection Report



## **RWS GROUP CERTIFICATION MEMBERSHIP AGREEMENT**

Farm Group Name:

Approved by:

Date:

Agreement between (*Farm Group Name*) represented by (*ICS Representative name*) and (*Farmer Name, Farm Name, Address*)

Signing this agreement becomes an obligation between the parties, for the fulfillment of the requirements of the Responsible Wool Standard, and states acceptance of the following commitments:

1. Commitments of the Farm Group
  - To administer the Internal Control System (ICS) in accordance with the requirements of the Responsible Wool Standard Certification.
  - To provide training to Farm Group members as required.
  - To promote good practice related to animal welfare and land health.
  - To manage the process of applying the requirements of the Responsible Wool Standard within the Farm Group.
  - To handle information with transparency, honesty and confidentiality.
  - To liaise with the external Certification Body that will conduct the third party verification
  
2. Commitments of the Farmer
  - To be aware of the requirements of the RWS, the Group Certification approach and the ICS.
  - To meet the requirements of the RWS.
  - To implement the recommendations and corrective actions issued by the ICS.
  - To allow access and provide correct information to internal and external inspectors.
  - To attend training sessions organised by the ICS.
  
3. Terms of the agreement
  - The present agreement has an indefinite duration and can be considered invalid by the non-compliance of the commitments by any of the parties, by voluntary resignation of the producer or by the termination of the Farm Group and the ICS.

In witness of (Name) this document is signed in (place) on (date)

(Representative of the Farm Group)

(Farmer)



## RWS GROUP CERTIFICATION INTERNAL INSPECTION REPORT

Farm Group Name:

Farmer Name:

Farm Name/address:

Approved by:

Date:

### Internal inspection report

Date  
Internal inspectors  
Annexes  
Remarks

### Corrective and preventative actions

Date