



NATIONAL CERTIFIED TRANSITIONAL PROGRAM

APPLICATION PROCESS GUIDANCE FOR ACAs

Any company or state agency that is already approved by the Agricultural Marketing Service (AMS) National Organic Program (NOP) as an “Accredited Certifying Agent” (ACA) would qualify to apply to AMS, Livestock, Poultry, and Seed Program’s (LPS) for the National Certified Transitional Program (NCTP). This is a voluntary program which include requirements that are based on a standard submitted by the Organic Trade Association (OTA). This document provides additional guidance for ACAs implementing the NCTP Standard.

To be approved by AMS, LPS for the NCTP, the ACA must submit the application and supporting materials to LPS under the ISO 17065 Conformity Assessment for bodies certifying products, processes, and services Program, which is administered by LPS. LPS is not granting ISO 17065 Accreditation, but simply stating that the ACA is meeting the requirements of an ISO 17065 certification program. OTA owns the “standard” that the ACAs will use for certifying an ACA client under the NCTP. Currently, the ACAs that meet the requirements of the USDA NOP regulation also meet most of the requirements of an ISO 17065 Program, except for the criteria detailed below. Therefore, they must describe how they are conforming to these additional requirements in the applicable scenario(s) listed below, as part of their application.

ACAs must submit a request letter and associated materials to: qad.auditservice@ams.usda.gov

ISO 17065 requirements that are not addressed by the NOP regulations (7 CFR part 205):

ACAs THAT ARE NOT ISO 17065 APPROVED BY ANY ORGANIZATION MUST SUBMIT THE FOLLOWING INFORMATION TO AMS, LPS QUALITY ASSESSMENT DIVISION (QAD) TO BECOME APPROVED:

1. ISO 17065 Section 5.1.3 requires that the company identify the board, group, or person having authority and responsibility for (a-n).
2. ISO 17065 Section 6.2.2 External Resources (outsourcing) requires a company that uses subcontractors to have requirements in place as to how they do the outsourcing and also the responsibilities of the company as to outsourcing.
3. ISO 17065 Section 8.2.3 requires that the ACA designate a person as a quality manager with certain responsibilities.
4. IOS 17065 Section 8.1.1 requires a quality management system (quality manual) be in place. (Note: the NOP regulations do not require a quality manual in its entirety, but the

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NOP application process for the most part fulfills the requirement, though not necessarily in an easily auditable format).

5. ISO 17065 Section 8.3 requires that the company have a procedure/process for Document Control.
6. ISO 17065 Sections 8.5 and 8.6 require a Management Review (MR) and an Internal Audit (IA) that cover the whole aspect of the Quality Management system with inputs and outputs defined, with a defined schedule (annual) for conducting both the MR and IA. (Note: the NOP regulations require a “program review” specific to only certain requirements of the NOP regulations.)
7. ISO 17065 Sections 8.7 and 8.8 require that the company establish procedures for Corrective Actions and Preventative Actions within the company.
8. ISO 17065 Sections 7.9.3 and 7.9.4 require that the company document surveillance activities. (Note: This is somewhat addressed in the NOP regulations but not in its entirety.)
9. ISO 17065 Section 4.1.2.2 j requires that an ACA client (producer) keep a record of all complaints made known to them relating to compliance with the certification requirements.
10. Certificate – The company must define how the “certificate” they will issue to Transitional clients will meet the requirements defined by the NCTP. (Note: certificates may not reference “Organic”.)
11. Training – The company must demonstrate their training of company personnel for the new program, as well as information/guidance provided to clients (producers) as to how the program will be implemented.
12. The company must submit procedure(s) and checklists/system plan examples/approval or denial or appeal processes/certificate examples, etc. for how they will implement the NCTP.

IF ACA IS CURRENTLY APPROVED UNDER THE AMS 17065 PROGRAM:

1. Training – The company must demonstrate their training of company personnel for the new program, as well as information/guidance provided to clients (producers) as to how the program will be implemented.
2. The company must submit procedure(s) and checklists/system plan examples/approval or denial or appeal processes/certificate examples, etc. for how they will implement the NCTP.

IF ACA IS CURRENTLY ACCREDITED FOR ISO 17065 BY A CERTIFICATION BODY OTHER THAN AMS:

1. The company must submit their current ISO 17065 Certificate.



2. The company must submit their most current Internal Audit and Management Review, along with a copy of most current report from the Accreditation Body.
3. Training – The company must demonstrate their training of company personnel for the new program, as well as information/guidance provided to clients (producers) as to how the program will be implemented.
4. The company must submit procedure(s) and checklists/system plan examples/approval or denial or appeal processes/certificate examples, etc. for how they will implement the NCTP.

AMS WEBSITE LISTINGS:

1. If the ACA is already approved under the USDA QAD 17065, their approval will be listed under the current AMS website listing for USDA QAD 17065, with the additional scope, as well as under the new AMS website listing for the NCTP.
2. If the ACA is ISO 17065 accredited by certification body other than AMS, they will only be listed under the new AMS website listing for the NCTP.
3. ACAs that fulfill the requirements of both the USDA QAD 17065 program as well as the NCTP, once approved, will be listed under both the AMS website listing for USDA 17065 listing and the listing for the NCTP.