

Agricultural Marketing Service

Livestock and Seed Program

Audit, Review, and Compliance Branch

100 Riverside Parkway Suite 101 Fredericksburg, VA 22406

DATE: March 21, 2011

TO: Certification bodies accredited under the USDA ISO Guide 65 Program

Samantha J. Simon, Accreditation Program Manager FROM:

SUBJECT: ARC Branch qualifications as an accreditation body

The Audit, Review, and Compliance (ARC) Branch is part of the U.S. Department of Agriculture, Agricultural Marketing Service, Livestock and Seed Program. The ARC Branch is headquartered in Fredericksburg, Virginia with field offices throughout the U.S. It operates under the Agricultural Marketing Act (AMA) of 1946, as amended, and the Code of Federal Regulations (CFR) Title 7, Part 62.

The ARC Branch accredits U.S. certification bodies to organic standard under the USDA ISO Guide 65 Program. This Program is a voluntary, user-fee, conformity assessment and accreditation service. The ARC Branch conducts assessments in accordance with ARC 00 Quality Manual, ARC 1000 Procedure and ARC 1012 Procedure. These documents are available at www.ams.usda.gov/lsiso65program.

Since 1999, the European Union (EU) has designated the ARC Branch as a competent authority for the assessment of organic certification bodies under ISO/IEC Guide 65:1996. This designation has allowed U.S. organic products certified by certification bodies accredited under the USDA ISO Guide 65 Program to be exported to the EU provided the products meet the import requirements.

In April 2009, the ARC Branch was recognized as an accreditation body of certification bodies for organic production and processing under the National Voluntary Conformity Assessment System Evaluation (NVCASE) Program. The NVCASE Program is operated by the U.S. Department of Commerce, National Institute of Standards and Technology. As a recognized accreditation body, the ARC Branch assesses and accredits certification bodies in accordance with ISO/IEC 17011:2004. The scope of the initial recognition included ISO/IEC Guide 65:1996 and EEC 2092/91. In July 2009, the scope was revised to include EC No 834/2007 and EC No 889/2008. Additional information about the ARC Branch's recognition as an accreditation body under the NVCASE Program is available at http://gsi.nist.gov/global/index.cfm/L1-4/L2-38/L3-99.

Since 2001, the ARC Branch has conducted independent, third-party assessments for the USDA National Organic Program (NOP) for the National Organic Program final rule (7 CFR Part 205). Upon request of the NOP, the ARC Branch conducts desk audits, initial onsite assessments, onsite mid-term surveillance assessments, and onsite reaccreditation assessments. These assessments evaluate the certification bodies' abilities to comply with 7 CFR Part 205, as well as to their own documented procedures. In addition, the ARC Branch is currently under evaluation by the Canada Food Inspection Agency, Canada Organic Office for consideration as a conformity verification body (CVB). As a CVB, the ARC Branch will be responsible for assessing, recommending for accreditation, and subsequently monitoring certification bodies meeting the applicable accreditation criteria as set out in the Canada Organic Regime. Assessments for both the NOP and COO are conducted in accordance with ISO/IEC 17011:2004.



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The ARC Branch is organized and operated so as to safeguard the objectivity and impartiality of its activities. Its policies and procedures are non-discriminatory and are administered in a non-discriminatory manner. The ARC Branch and its employees do not offer or provide any service that affects impartiality, including consultancy. Employees must be free from any undue commercial, financial, and other pressures that could compromise impartiality. The ARC Branch and its employees do not disclose confidential information of a certification body outside of the ARC Branch without written consent of the certification body, except where the law requires such information to be disclosed without such consent.

The ARC Branch utilizes a team of twelve employees to manage and provide services for the USDA ISO Guide 65 Program. Employees have sufficient knowledge, qualification, training, and experience with respect to organic agriculture in general and with the relevant organic standards in particular. The ARC Branch has established procedures for selecting, training, and formally approving auditors, as well as for monitoring the performance and competence of auditors. Auditors are evaluated annually and are observed on-site regularly. Auditors are evaluated on their knowledge of ARC Branch policies and procedures, program requirements, organic standards, assessment activities, and personal attributes. All ARC Branch auditors have successfully completed ISO 9001 Lead Auditor Training and are certified as Quality Auditors by the American Society for Quality (ASQ) after satisfactorily fulfilling the requirements established by ASQ for professional attainment in quality auditing.

The ARC Branch has established procedures for assigning audit teams and conducting assessment activities. Auditors are assigned on the basis of their knowledge, skills, and expertise. Assessments are conducted in accordance with Section 6, Audit Activities, of *ISO 19011:2002*, which provides a format for evaluating a certification body to ensure consistent assessment practices and promotes international recognition of assessment results. The results of assessments are documented within an audit report in accordance with established procedures.

Since 1999, the ARC Branch has conducted over 350 onsite assessments of organic certification bodies. These assessments include a review of offices conducting key activities, personnel, certification files, and at least two witness audits of organic operations. Assessments and witness audits have occurred around the world on every continent except for Antarctica.