



Guidance on the APS Transition Policy and New Requirements

Fair Trade USA

Version 1.0.0

A. Purpose

As a result of Fair Trade USA's update to its standard and implementation of the Agricultural Production Standard (APS) starting May 1, Fair Trade USA has designed the APS Transition Policy to ensure that producers have sufficient time to achieve compliance to new requirements. The purpose of this document is to outline considerations and provide guidance on how to implement the Transition Policy for eligible new APS requirements. New requirements were not covered in any way by compliance criteria in the indicated prior standard. For eligible critical new requirements, please see Fair Trade USA APS Themes and Comparison with Prior Standards

B. Scope

The considerations and guidance outlined in this document applies to all existing Certificate Holders (CH), Conformity Assessment Body (CAB), and Auditors. Considerations and guidance in this document does not apply to new applicants seeking certification to the Fair Trade USA APS.

C. Related Documents

- APS Transition Policy, version 1.2.0. This document can be found at: <http://fairtradeusa.org/certification/standards/download-center>.
- Summary of APS Themes and Comparison with Prior Standards, version 1.0.0. This document provides a summary of the themes and requirements in the APS, and how these compares to the requirements under Fair Trade USA's prior standards.
- CAP Form, version 1.0.0. This form will be provided by the CAB, along with the final Audit Report. Instructions on how to use this form can be found in the CAP document.
- Agricultural Production Standard, version 1.0.0. For more details on specific topics, see the full modules and compliance criteria within the APS.



1. APS Transition Policy – Key Reminders

1.1. New Critical requirements have been determined by Fair Trade USA. Information on completely new or partially new requirements can be found in the Summary of APS Themes and Comparison with Prior Standards document.

1.2. Audits will be conducted against all APS requirements, as well as any relevant APS policies and guidance documents. CHs are required to meet compliance against all APS Critical criteria applicable to the CH's certification year, and against all Progress criteria to reach sufficient Progress Points required by APS module in the applicable certification year.

1.3. Transition Policy summary:

- Only existing CHs can be beneficiaries of the Transition Policy, and no new applicants.
- Transition period of one year from publication of the standard to March 1, 2018, will be allowed for all Non-Compliances (NC) against Critical criteria which are completely new or partially new.
- Regular audit and certification cycle requirements apply (e.g. any CH on their Year 3 audit must comply with Year 3 requirements of the APS).
- No additional requests for extensions on new requirements beyond the transition period will be granted.
- See APS Transition Policy document to understand all its requirements.

2. Audit

2.1. **Pre-Audit:** All existing clients were sent the APS Transition Policy in March, 2017. Any questions on how it applies to specific requirements should be directed to the Fair Trade USA representative.

2.2. **Opening Meeting:** Auditors will answer broad questions related to written Fair Trade USA APS policies (e.g.: APS Transition Policy).

2.3. **Closing Meeting:** Audit findings and NCs requiring Corrective Action are presented to the client at the end of the audit. Auditors will refer the client to their Fair Trade USA representative, to the APS Transition Policy and to the Summary of APS Themes and Comparison with Prior Standards, for additional guidance on eligible new Critical criteria.

2.4. **Post-Audit:** Along with audit report and corrective action plan (CAP), the CAB will support the client by sending the following documents: Transition Policy and Summary of APS Themes and Comparison with Prior Standards.

3. Transitioning to APS

Final audit reports and CAP forms will provide all NCs detected during an audit. Any existing client transitioning to APS may choose to apply the Fair Trade USA's Transition Policy, and obtain an extension to close a NC of any eligible new Critical criteria.

3.1. Conformity Assessment Body and Certificate Holder

3.1.1. Notification of NCs to Critical criteria, will be provided by the CAB in their communication to the CH.

3.1.2. NCs to Critical criteria that are completely new to the APS will be identified as *Completely New* to signify that they are eligible for Extended CAP Process, see Example 1.



3.1.3. NCs to Critical criteria that are partially new to APS will be identified as *Partially New* to signify that part of compliance criteria is new to the APS, and NCs to the new part will be eligible for Extended CAP Process. The CAB will include these in the CAP form sent to the CH, please see Example 2.

3.1.4. NCs to Critical criteria which have not changed from the previous standard will be identified as *Not New* must be closed through a regular CAP process and are not eligible for the extended CAP process, please see Example 3.

Examples:

Corrective Action Plan

Non-Compliant Critical Criteria

Criteria No.	Compliance Criteria	Evidence	Farm Size	Supporting Information	Corrective Action Plan	Date	Responsible for Completion
3.5.1.b	<i>If a third party is used to recruit migrant workers, the employer has policy and practices in place to ensure that the entity contracted to recruit is in compliant with the requirements in 3.5.1.a</i>			<i>Completely New</i>			
1.1.1.a	<i>The CH understands the intent, purpose, and requirements of the FTC, needs assessment, and FT Premium Plan.</i>			<i>Partially New</i>			
4.2.2.d	<i>Buffer zones around protected areas, water bodies, and drinking water sources are maintain. Crop cultivation, fertilizer application, pesticide application, and waste disposal do not occur in buffer zones.</i>			<i>Not New</i>			

Example 1 (points to row 3.5.1.b)

Example 2 (points to row 1.1.1.a)

Example 3 (points to row 1.1.1.a)

3.1.4. The CH shall use the term Extension – Plan/Timeline in their CAP response to the CAB to confirm their wish to use the extended CAP process for completely new Critical criteria, please see Example 4. As indicated in the Transition Policy, clients are only required to present a CAP and timeframe for implementation prior to March 1, 2018.

3.1.5. The CH shall confirm their wish to use the extended CAP process for partially new Critical criteria in their CAP response to the CAB, and specify the aspect of the partially new Critical criteria, please see Example 5.a for guidance on how to confirm.

3.1.6. The client can specify the partially new Critical criteria component by pulling this information from the Summary of APS Themes and Comparison with Prior Standards and presenting the planned corrective action and timeframe for implementation prior to March 1, 2018 deadline. Please see Example 5.b.



Examples:

CAP Form

Non-Compliant Critical Criteria

Criteria No.	Compliance Criteria	Evidence	Farm Size	Supporting Information	Corrective Action Plan	Date	Responsible for Completion
3.5.1.b	<i>If a third party is used to recruit migrant workers, the employer has policy and practices in place to ensure that the entity contracted to recruit is in compliant with the requirements in 3.5.1. a</i>			Completely New	<i>Extension – Plan/Timeline</i>		Example 5.a
1.1.1.a	<i>The CH understand the intent, purpose, and requirements of the FTC, needs assessment, and FT premium plan.</i>			Partially New	<i>Extension for partially new CC for X reason(s): Training to be scheduled in late October</i>	12/15/2017	Example 5.b

3.1.6. The CH must ensure that their responses in the CAP are directly connected to their NC. The CAB will receive and assess the responses from the clients for these partially new requirements and provide further guidance through the CAP review.

3.1.7. The CAB would assess the submissions from the client and either close the NC or request additional information.

3.1.8. CHs must provide additional new information to the CAB, when a submitted CAP was not sufficient to close the NC or where the proposed action and timeline for implementation was not presented for NCs qualifying for the extended CAP process.

3.1.9. NCs linked to unchanged components of any partially new Critical criteria would not be eligible for APS Transition Policy.

3.1.10. Clients can seek guidance with their CAB representative in regards of the APS Transition Policy and eligible new requirements. In any circumstance, the CH can follow up with Fair Trade USA for further clarifications on APS documents and requirements.

