



# Accredited Certifiers Association, Inc.

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October 25, 2010

Lisa Ahramjian, Executive Director  
The National Organic Standards Board  
1400 Independence Avenue, SW  
Room 2646 – So., Ag Stop 0268  
Washington D.C. 20250-0268

RE: AMS-NOP-10-0068; NOP-10-08

**Livestock Committee – Organic Apiculture Recommendation, and  
Compliance, Accreditation and Certification Committee - Clarifying Limitations of  
§ 205.101(b): Recommended Guidance Toward Reducing Fraud in the Organic Marketplace**

Dear Lisa:

Thank you for the opportunity to provide comments to the National Organic Standards Board regarding the above documents. The Accredited Certifiers Association is a non-profit educational association representing 41 USDA Accredited Certifying Agents, including both domestic and foreign based.

ACA would like to express our thanks to all of the National Organic Standards Board Members for the time and effort expended to provide these recommendations to the organic community for consideration.

## **Livestock Committee – Organic Apiculture Recommendation**

The ACA supports the Livestock Committee Organic Apiculture Recommendation and requests that the National Organic Program implement rulemaking on this important production sector in a timely manner. Currently there is wide variation in the requirements for honey labeled as “organic” and this leads to confusion among consumers. We believe that the implementation of an organic apiculture standard will provide consumers with a reliable, verifiable source of organic honey.

## **Compliance, Accreditation and Certification Committee - Clarifying Limitations of § 205.101(b): Recommended Guidance Toward Reducing Fraud in the Organic Marketplace**

The ACA supports the recommendation of the CACC regarding Clarifying the Limitations of §205.101(b).

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*USDA-accredited certifying agents working together to ensure the integrity of  
organic certification in the United States*

Sincerely,

*Patricia Kane*

Patricia Kane  
ACA Coordinator