



Accredited Certifiers Association, Inc.

*Accredited certifying agents working together to ensure
the integrity of organic certification in the United States*

March 19, 2013

Ms. Michelle Arsenault, Special Assistant
National Organic Standards Board
USDA-AMS-NOP
1400 Independence Ave. SW.,
Room 2648-So., Mail Stop 0268
Washington, DC 20250-0268;

Re: Docket AMS-NOP-12-0070
NOSB Handling Subcommittee **Auxiliary / "Other Ingredients" Proposal**

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) regarding the Handling Subcommittee Proposal entitled Auxiliary / "Other Ingredients".

The Accredited Certifiers Association (ACA) represents 48 foreign and domestic accredited certifying agents. Our comments were developed through a Working Group of interested ACA members with input solicited from our entire membership.

The ACA appreciates the work of the Subcommittee in compiling this Proposal based upon comments received on their August 2012 Discussion Document.

The ACA is supportive of the Subcommittee Proposal and requests that the Board adopt this proposal. Our specific comments follow.

Definition of Other Ingredients

As the Regulation does not contain a definition of "other ingredients" and this proposal does not require rulemaking, we believe that the NOSB should clarify with the National Organic Program (NOP) that any instruction or final guidance contain a clear definition of "other ingredients". The first 3 paragraphs of the Subcommittee definition should be included in any instruction or final guidance document.

Baseline Criteria

The ACA supports the Baseline Criteria established in the Proposal.

Policy and Procedure

ACA supports the Policy for Review and the Procedures the Subcommittee has outlined in the proposal. We agree that the “other ingredients” reviewed do not require addition to the National List, and support the identification of the “other ingredients” reviewed on the Review Checklist. We support the stated flexibility in the review of agricultural “other ingredients”.

Other Considerations

ACA agrees with the concept of a transition period for operators to bring products into compliance to prevent disruption of markets.

ACA also supports moving cleaners, sanitizers, disinfectants and other non-food substances such as boiler additives to their own dedicated section of the National List. We believe that they should be listed and considered separately as they are not “ingredients” as the heading titles for §205.605 and §205.606 state.

Again, we thank the Subcommittee for the work on this aspect of review of ingredients. We believe that this policy will establish additional clarity and consistency in the review of ingredients.

Respectfully submitted,



Patricia Kane
Coordinator