



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 Compliance, Accreditation & Certification Subcommittee Proposal
Calculating Percentage of Organic Ingredients in Multi-ingredient Products

Dear Ms. Arsenault:

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) regarding the Compliance, Accreditation & Certification Subcommittee Proposal entitled Calculating Percentage of Organic Ingredients in Multi-ingredient Products.

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 CAC Subcommittee in compiling this Proposal based upon comments received on their August 2012 Discussion Document.

The ACA supports the Subcommittee Proposal and requests that the Board adopt this proposal at the April 2013 meeting.

We do have one minor suggested revision to the Proposal that we believe will provide clarification to handlers and ACAs. We support the Proposal request that NOP establish and maintain an easily accessible website with examples of how to calculate percentage organic ingredients in multi-ingredient products, and, as noted in the Discussion portion of the Proposal, develop a sample self-calculating form for use by handlers. We ask that should this form be developed, the use by handlers and certifiers not be mandatory, as many ACAs utilize their own self-calculating forms that work well for their clients.

It is noted in the Discussion portion that the use of one standard NOP generated form would not be required, however this statement was not included in the Recommendation portion of the Proposal. For clarification purposes Section # 2 Self-Calculating Forms should be revised as follows:

The CACS proposes that handlers utilize a self-calculating form of their own, or utilize a form provided by their certifier so that a uniform method of calculation is clearly established. One standard NOP generated form used by all certifiers however is not required.

Again, we thank the Subcommittee for their efforts regarding providing clarification and consistency to the task of calculating percentages of organic ingredients in multi-ingredient products. The development of NOP Guidance on this topic will provide additional consistency to the certification process.

Respectfully submitted,

A handwritten signature in cursive script that reads "Patricia Kane".

Patricia Kane
Coordinator