



# Accredited Certifiers Association, Inc.

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

March 30, 2017

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

Docket Number: AMS-NOP-16-0100  
Crops Subcommittee Proposal on  
Strengthening Organic Seed Guidance (NOP 5029)

Thank you for the opportunity to provide comments to the National Organic Standards Board (NOSB) Crops Subcommittee Proposal on Strengthening Organic Seed Guidance. The Accredited Certifiers Association (ACA) is a non-profit educational organization, and our membership includes 54 USDA Accredited Certification Agents.

We appreciate the time the Crops Subcommittee has put into this topic. The use of organic seed is an important component on the maintenance and growth of the organic sector. As such, we support the goal of striving for increased organic seed use. We offer brief comments regarding the proposed language at *§205.204(a)(1)(i) Improvement in sourcing and use of organic seed and planting stock must be demonstrated every year until full compliance with (a) is achieved.* While the ACA would like to see increased organic seed use, we recognize that “full compliance,” may be extremely difficult for some to achieve, especially on vegetable operations.

We also appreciate the thought the subcommittee has given to the topic of certifier training on issues related to organic seed use. While the ACA Board is in the process of establishing the work plan for the coming year, organic seed use is one of several topics for which ACAs have expressed the need to prioritize. Should the proposed changes be implemented, then it seems likely that ACAs would prioritize work in this area even more highly. The ACA appreciates the offer related to CACS collaboration on the development of training materials. We look forward to continued conversation on this topic.

Thank you to the Crops Subcommittee for the work you have done and for considering our comments.

Respectfully Submitted,

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Coordinator