



# Accredited Certifiers Association, Inc.

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

December 10, 2013

Miles McEvoy, Deputy Administrator  
National Organic Program  
U.S. Department of Agriculture  
Room 2646-So. (Stop 0268)  
1400 Independence Avenue SW  
Washington, DC 20250

Dear Miles,

The Accredited Certifiers Association (ACA) would like to thank the National Organic Program (NOP) for publishing the revised NOP 2603 Organic Certificates Instruction Document.

An ACA Working Group has been addressing issues surrounding Certificates and the group was pleased that the NOP clarified that a labeling category for each product certified is not required for products in the crops, livestock and wild crops certification categories (Section 3.1.8).

Our Working Group has concluded that the crops, livestock and wild crops listed on certificates can now be assumed to be 100% for the purpose of calculating ingredient content and for labeling. This will streamline the review of ingredient profiles and labels for products as additional verification of the category will no longer be necessary.

In order to encourage consistency we will be sharing this conclusion with other ACA members. Please let me know if you have other information to add to our conclusion. Thank you for this clarification.

Sincerely,

Patricia Kane  
Coordinator