



Accredited Certifiers Association, Inc.

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December 13, 2010

Toni Strother
Agricultural Marketing Specialist
National Organic Program
USDA-AMS-NOP
1400 Independence Ave., SW.
Room 2646 So., Ag Stop 0268
Washington, DC 20250-0268

**RE: AMS-NOP-10-0048; NOP-10-05
Comments on NOP Draft Guidance Document Compost and Vermicompost in Organic
Crop Production**

Dear Ms. Strother:

Thank you for the opportunity to provide comments to the National Organic Program on the NOP Draft Guidance Documents published in October 2010. We appreciate the process of the NOP issuing "draft" guidance documents and offering the opportunity for comment from the organic community.

The Accredited Certifiers Association is a nonprofit educational association comprised of USDA accredited certification agencies and additional supporting members. We currently have 40 accredited agencies in our membership.

ACA supports the Compost and Vermicompost in Organic Crop Production Guidance document. We thank the National Organic Program for recognition of the work of the NOSB Task Forces involved in drafting the NOSB recommendations, on Compost and Compost Tea. We believe this document will provide clarity regarding the vermicomposting process.

ACA sincerely thanks the National Organic Program for the efforts to clarify various portions of the Rule and for the opportunity to provide comments.

Sincerely,

Patricia Kane
ACA Coordinator