



# Accredited Certifiers Association, Inc.

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March 14, 2011

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

Re: AMS–NOP–10–0045; NOP–10–03 – Notice of Draft Guidance Concerning ‘‘Made With Organic (Specified Ingredients or Food Groups)’’ Products: Product Composition and Use of Percentage Statements

Dear Ms. Strother:

Thank you for the opportunity to provide comments to the National Organic Program regarding the Notice of Draft Guidance Concerning ‘‘Made With Organic (Specified Ingredients or Food Groups)’’ Products: Product Composition and Use of Percentage Statements. The Accredited Certifiers Association (ACA) is a non-profit educational organization and our membership includes 40 USDA Accredited Certification Agents.

ACA supports the issuance of the NOP guidance regarding ‘‘Made With Organic (Specified Ingredients or Food Groups)’’ and we offer the following comments for your consideration.

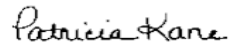
# 1 The guidance states that any synthetic substance may be used to manufacture a substance on §205.605; however, if the synthetic is present in the final §205.605 substance, the synthetic must also be on the National List and allowed for the intended use.

This policy is not consistent with current materials evaluations within the organic industry, including by the National Organic Standards Board, for §205.605 materials. Several materials in this section of the National List commonly contain additional synthetics that are not on the National List. ACA would like to see this statement regarding other synthetics in section .605 materials removed from the guidance. Further discussion from the National Organic Standards Board regarding the parameters for §205.605 materials would be welcome.

#2 There are several revisions to NOP policy contained in this guidance document, and along with additional new policies recently released, which will require changes in product labeling. We suggest that once the guidance is finalized and published, certified operations should be allowed to use up their previously approved label inventory. The cost of label design and production is significant and certified operators should not be subjected to significant label revision costs due to these policy revisions and clarifications.

ACA thanks the National Organic Program for considering our comments.

Sincerely,

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

Patricia Kane  
ACA Coordinator