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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Comments on NOP Draft Guidance Document Outdoor Access for Organic Poultry**

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Thank you for the opportunity to provide comments to the National Organic Program on the NOP Draft Guidance Documents published in October 2010.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 appreciates the National Organic Program’s intent in providing guidance for the management of organic poultry. ACA believes that while this document is a start at clarifying outdoor access for poultry, additional details are needed in the Policy portion. We are concerned that the Policy lacks many of the specific references in regard to space requirements, living conditions and access to the outdoors included in the 2002 and 2009 NOSB Recommendations. We believe that certification agents would not have the authority to require poultry management follow the requirements contained in the NOSB Recommendations, unless the requirements were included in the Policy or additional rulemaking was instituted.

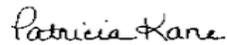
In addition, a new term “hen run” is used without definition. This term has not been used in the past and we ask that clarification be provided in the form of a definition. In particular, is this thought to be an enclosed area, or an area with vegetation?

We thank you for your consideration and inclusion of the NOSB Recommendations. These documents provide much of the clarity needed regarding the management of organic poultry. Since the NOSB is continuing to work on the topic of living conditions in regard to animal welfare, we respectfully request that the National Organic Program wait for the completion

of the NOSB work in this area and then institute additional rulemaking to address management of organic poultry. Rulemaking will provide additional opportunity to solicit comments, and once complete will provide clarification on the specific requirements for management of organic poultry. Producers and certifying agents would then have the tools necessary to provide consistent management techniques for organic poultry.

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