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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Comments on NOP Draft Guidance Document The Use of Chlorine Materials in
Organic Production and Handling**

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Thank you for the opportunity to provide comments to the National Organic Program on the NOP Draft Guidance Documents published in October 2010.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 Use of Chlorine Materials in Organic Production and Handling Guidance document and welcomes the clarifications. We believe that the section entitled “Livestock Operations” does need some additional clarification. The word “equipment” is used in both bullet points, even though the bullet points address differing rates of chlorine use. It would be helpful if the equipment noted in either bullet point #1 or #2, was more specific in order that there is clarity on the types of equipment falling in each category.

In the section addressing Handling operations, in the 2nd bullet point, the language is not correct. “Water” should be changed to read: Water containing chlorine materials, otherwise the balance of the sentence does not read correctly.

Also, we believe that there are some regulatory situations that may prohibit the use of a potable water rinse after disinfection. We suggest the guidance be expanded to include rinsing, other intervention, or testing that verifies the residual chlorine limit complies with the Safe Drinking Water Act.

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

Patricia Kane
ACA Coordinator