



Accredited Certifiers Association, Inc.

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

Sonny Perdue
Secretary
U.S. Department of Agriculture
1400 Independence Avenue S.W.
Washington, DC 20250

Dear Secretary Perdue:

Congratulations on your new position as Secretary of the United States Department of Agriculture. The Accredited Certifiers Association (ACA) represents 54 USDA-accredited certifying agents, and over ninety percent of US-based certifiers are among our membership. Our primary mission is to ensure the integrity of organic certification to the USDA National Organic Program regulations. We do this through certifier training and support, networking opportunities, and providing a forum for discussion of issues affecting organic certification.

The National Organic Program is of vital importance to the United States' agricultural economy and to rural communities, along with a variety of additional stakeholders. In recent years, the organic industry has experienced double-digit growth, showing consistent yearly gains and far outpacing the broader agricultural sector.

Consistent enforcement of the USDA Organic Regulations is crucial to success of the National Organic Program. It creates and a fair and level playing field for organic farmers and handlers. These two components translate into consumer trust in the USDA Organic label. That is why the National Organic Program's completion of the Organic Livestock and Poultry Practices Rule, published on January 19 of this year, has been strongly applauded by the majority of Accredited Certifying Agents and the farms they certify.

The rulemaking was a tremendous undertaking and a great success, born from a process involving 6,700 public comments and collaboration with a variety of relevant government agencies. These include the USDA Food Safety and Inspection Service, USDA Natural Resources Conservation Service, USDA Animal Plant Health Inspection Service, the Food and Drug Administration, and the Environmental Protection Agency.

While the new rule was originally scheduled to go into effect on March 20, 2017, a sixty-day delay has resulted in a new effective date of May 19, 2017. The National Organic

Standard Board recently passed a unanimous resolution in support of implementing this new rule without further delay. The ACA represents a wide variety of certification agencies, including many of the largest and most knowledgeable certifiers of organic livestock, and we support and echo this request.

We thank you for your consideration and offer you our best regards as you embark on your new journey. Also, we invite you to reach out to us with any questions you might have about the work we do.

Sincerely,



Kyla Smith, Chair
ACA Board of Directors

cc: Miles McEvoy, Deputy Administrator
National Organic Program